

EXHIBIT Z



Inspection Report

ENVIGO RMS LLC
8520 Allison Pointe Blvd., Suite 400
INDIANAPOLIS, IN 46250

Customer ID: 506554
Certificate: 32-A-0774
Site: 005
ENVIGO RMS LLC

Type: FOCUSED INSPECTION
Date: 20-JUL-2021

2.40(b)(2) **Critical**

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

Mortality records show that during the time period from 01/01/2021 to 07/22/2021 over 300 puppy deaths were attributed to unknown causes, however, the facility has not taken additional steps to determine the causes of death in order prevent similar deaths of other puppies in the future. Current guidance from the attending veterinarian is that she should be notified when adult dogs are found dead, however, when puppies are found dead she may or may not be notified. Instead, the animal care staff (who have significant additional responsibilities) are permitted to make the decision of whether the body is disposed of without examination or if they perform a gross necropsy examination. When a gross necropsy has been conducted, the medical records recording those results are incomplete. The lack of consistently applied methods to accurately diagnose the cause of deaths for these animals and complete record-keeping when tests are performed limits the ability to determine causes of deaths and implement changes that would prevent the deaths of additional animals.

***165 puppies under 5 weeks of age were found dead and the cause of death is identified as "unknown" in the medical records. Individual medical records are not recorded for puppies less than 5 weeks old, instead litter records are maintained. The medical records that were evaluated did not have any recorded information indicating abnormalities observed prior to death and did not include any information regarding a potential cause of death, investigation of death, or

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body condition when found.

***5 puppies (CMBCGY, a 7 week-old female; CLLCFK, a 7.4 week-old female; CMDCHW, a 7.4 week-old male; CMBCHN, a 6.9 week-old male; CLLCMY, a 6.3 week-old male) were found dead in building G2 and the cause of death identified in the medical records is "unknown". These deaths occurred in February, April, and June of 2021. The individual medical records for these animals were evaluated and there were no notations of any abnormalities observed prior to being found dead. There were no post-mortem examination results recorded and no record of any attempt made to determine the cause of death for these animals.

***16 dogs over 5 weeks of age and 157 puppies under 5 weeks of age were found dead and postmortem change ("PMCH") was recorded as the cause of death. According to the attending veterinarian, this code is generally used to indicate that postmortem decomposition (autolysis) was present and no other causes of death could be identified. Individual medical records were only maintained for those puppies over 5 weeks old while "litter records" were maintained for those under 5 weeks old. The subset of records checked did not include any recorded information indicating abnormalities observed prior to death, how long bodies were stored before post mortem examination, or body condition when found.

Adequate veterinary care is essential for preventing, identifying, controlling, and treating animal health issues all stages of life. Due to their immature body systems and small size, young puppies are especially vulnerable to stress, infection, and illness. Failure to provide adequate veterinary care including both adequate observations to recognize subtle signs of illness in live animals (as required by section 2.40(b)(3)) and appropriate methods to diagnose disease post mortem when unexpected deaths occur may result in a failure to implement measures to prevent or control disease for the remaining animals.

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Correct by August 7th, 2021 by providing adequate veterinary care to include the use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and the availability of after hours and emergency care.

2.50(a)(1)

Time and method of identification.

Weaned puppies and adult dogs are individually identified by a tattoo placed on the inside of the ear when dogs are approximately 5 weeks old. The use of tattoos for official identification must be approved in writing by the APHIS Administrator. Approvals for the use of tattoos typically specify the location of application as well as a standard prefix which will be applied to all animals from the particular licensee or registrant. The tattoos currently in use by the licensee do not appear to conform to the standard tattooing conventions approved by the administrator. Additionally, Animal Care has no record of a tattoo request on file from this licensee and no records of any approval for the use of tattoos as official identification.

Accurate identification of all live dogs is important for animal identification, traceability of animals, and investigation of disease outbreaks or animal theft.

Correct by August 30th, 2021 by obtaining approval from the Administrator for the use of tattoos as dog identification, or by using an alternative method of identification that does not require written approval by the Administrator.

2.75(a)(1)

Records: Dealers and exhibitors.

The facility is currently missing disposition records for several of their dogs and puppies.

Disposition records show that there are three adult dogs whose disposition is recorded as 'missing':

- 1) CLICEE, 9 months old, missing on 7/2/21
- 2) CLGCKD, 1 year old, missing on 7/2/21
- 3) CLJCDN, 4.7 months old, missing on 2/25/21

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Disposition records show that 21 puppies were recorded "miss" during the time frame 01/01/2021 to 07/22/2021.

The attending veterinarian stated that these dispositions, recorded as "miss", are likely due to data collection, data entry or administrative error, and will be corrected when dogs are identified.

Accurate and complete recordkeeping of all acquisitions (including births) and dispositions is important for animal identification, traceability of animals, and investigation of disease outbreaks or animal theft.

Correct by August 30th, 2021 by maintaining records that fully and accurately record the disposition of animals in accordance with 2.75(a)(1).

2.75(a)(2)

Records: Dealers and exhibitors.

The facility is not using official APHIS Forms 7005 and 7006 to record acquisitions and dispositions of dogs and cats.

Instead, the facility is maintaining electronic records for acquisition and disposition information. There is currently no approved variance is on file from the APHIS Administrator regarding electronic record keeping.

Recordkeeping is important for animal identification, traceability of animal movement, search for missing animals, and investigation of disease outbreaks or animal theft.

Correct by August 30th, 2021 by using official APHIS Forms 7005 and 7006 for recording acquisition and disposition records, or by requesting a variance from the APHIS Administrator to use electronic records.

3.1(c)(1)

Housing facilities, general.

The facility has widespread problems with maintenance of primary enclosures, dog toys, and dog-contact surfaces:

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*** There are plastic hanging doors in most of the sheltered housing runs in Buildings G1, G2, and G3. Approximately 90% of the plastic hanging doors have badly chewed edges with dirt and grime embedded in the edges. Some of the flaps have been chewed so much that they are completely missing and the metal flashing around the doors is also damaged or missing.

*** Dog toys such as rubber 'Kongs' and plastic dumbbells are provided for many of the dogs. Approximately 75% of the toys are severely worn resulting in irregular, pitted, flaking, and worn plastic surfaces. One Kong was found in an enclosure located in Building G3, Room 1 that was missing a large chunk of rubber; small pieces of rubber were present in the waste trough under the plastic coated metal grate flooring.

*** In Building 96, Room 6, approximately 50% of the solid-floored whelping kennels had areas of chipped and peeling paint and exposed concrete on the back wall of the kennel. The kennels have a nesting area in the rear by the wall with bedding where the puppies stay. The areas of flaking paint are low on the wall and adjacent to the area used by the animals.

*** Throughout Buildings G1, G2, and G3 there are several areas of chipped concrete around the edge of the hole that provides access between the inside and outside areas of each kennel. Some of the chipped concrete creates gaps about $\frac{1}{2}$ inch to 1 inch in size between the concrete and the metal flashing of the door frame. Areas with chunks of concrete missing have an underlying irregular, unsealed, and uneven surface.

*** Metal kennel walls, gates, metal flashing surrounding the dog door flaps, heat lamps, and metal grates covering the waste troughs have excessive accumulations of rust and deterioration. Buildings G1-3 have approximately 5-10% of their kennel walls, gates, or metal flashing surrounding the dog door flaps affected by rust. The rust on the metal kennels leaves a residue on hands and flakes off when touched. The remaining metal has pitting on the surface. In Building G3, Room 2, the metal heating unit suspended above the dog kennels has accumulations of rust on the underside of the

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metal tubing and on supporting brackets. In Building G2 each room has an outdoor waste trough running underneath the raised, plastic-coated metal grate flooring. At one end there is a metal grate covering an access point to the trough. Closest to the kennels there is an accumulation of flaking rust on the grate covering approximately 5-10% of the surface area.

*** Plastic whelping trays are present in some of the enclosures containing dams and nursing puppies. Approximately 10% of the whelping trays have edges and/or corners that are badly chewed and worn. In some cases, pieces of the plastic are missing altogether. A white plastic board (approximately 2 inches tall) is used as a divider in some solid-floored kennels containing dams and nursing puppies in building 96/97. Approximately 10% of the dividers have deep bite marks, chewed edges, and many of these chewed areas contain organic debris and hair. In Building 97, many of the metal cages containing dams and nursing puppies contain a white plastic board (approximately 2 inches tall) across the base of the door inside the front of the cage. Approximately 10% of these plastic boards were chewed and worn.

Surfaces that are worn, chewed, or in poor repair may harbor organic matter or bacteria that can cause illness, injury, or poor health in dogs. Surfaces and structures in poor repair may trap, cut, or otherwise injure animals.

Correct by August 31, 2021 by maintaining enclosures, toys, and other surfaces in good repair.

3.6(a)(2)(ii) **Critical**

Primary enclosures.

Records show that during the time frame January 1, 2021 to July 22, 2021, 71 dogs were injured when a body part (such as an ear or tail) was pulled through the wall of the kennel by a dog in an adjacent kennel and bitten. The exact injury varied in each case, however substantial or minor, the dogs were subsequently euthanized. Although some enclosures had solid walls separating animals from the adjacent enclosure, the majority of kennels in the facility are constructed

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using either metal wire or mesh to separate animals in adjacent enclosures. Dogs with body parts pulled through cage walls have experienced physical harm and unnecessary pain.

Correct by August 7th, 2021 by housing dogs in primary enclosures that protect the dogs from injury, including protecting animals from injury by dogs in adjacent enclosures.

3.7 **Critical**

Compatible grouping.

Records show that 2 female dogs were found dead from fight wounds, the first on 3/14/21 (CEJCGL) and second on 3/18/21 (CFHCUB). Additionally, on 5/26/21 an intact 6-year-old female dog (CFGCMJ) was found dead killed by a cage mate.

Records show there were 48 dogs (over 5 weeks of age) who had fight wounds during this same time period (01/01/21-07/22/21).

When asked about compatibility, the facility representative stated that following a fight, animals are relocated to a new enclosure.

Dogs injured or killed by cage mates may experience pain, distress, suffering, and death.

Correct by August 7th, 2021 by ensuring that all dogs housed in the same primary enclosure are compatible. Ensure that there is a mechanism of observation in place to ensure compatibility and prevent fighting.

3.11(a)

Cleaning, sanitization, housekeeping, and pest control.

The waste gutters below the main sheltered housing of Buildings G1, G2, and G3 contained a large accumulation of feces, urine, standing water, insects (both dead and alive) and uneaten food under the raised indoor and outdoor kennel floors. Near the outside gutters there is an overpowering ammonia and fecal odor that emanates from below the kennels.

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Inside the buildings, below the raised kennel floors there is an accumulation of feces, urine, insects (dead and alive), and food. Large numbers of cobwebs are present at the access points to the drain trough, which in some cases impede visualization of the length of the trough. There is organic matter and debris surrounding the inside access points to the drains and against the wall of the rooms. Around the entire facility are large populations live insects including house flies, drain flies, water bugs, cockroaches, and spiders with cobwebs. According to the facility operations manager, a pump in the system that cleans the gutters had broken on Thursday of the previous week and the facility had been unable to clean out the gutters since that time. The accumulation of organic material under the kennels has been present for 6 days without waste removal, and was continuing to grow. The facility operations manager stated that the gutters are typically cleaned every other day when the system is operational.

Build up of feces, urine, food waste and water waste provide breeding grounds for pests and insects, expose the dogs to unnecessary disease hazards, and cause noxious odors.

Correct by July 30th by maintaining a cleaning system that ensures excreta and other waste is removed from under primary enclosures often enough to prevent excessive accumulation of feces and food waste, and to reduce disease hazards, insects, pests, and odors. Additionally ensure that drainage and waste disposal is maintained in accordance with 3.1(f).

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3.11(b)

Cleaning, sanitization, housekeeping, and pest control.

In the Buildings 96 and 97, adult female dogs nursing litters of puppies were housed in solid-floored dog runs. There was a build up of brown organic material on the walls of the dog runs, mainly located near the front of the runs. The facility operations manager stated that the floors in the runs were cleaned daily but the walls were spot cleaned with a degreaser (GP-100) and hot water daily or on an as-needed basis. The facility operations manager stated that these kennels are power washed and sanitized between litters, but are not sanitized during the 6 weeks that the dams and puppies are housed there.

Animal enclosures in the whelping building are cleaned in accordance with two procedures. The first procedure, "Whelping building pressure washing" (EGS-SOP-PRD-6512) outlines pressure washing and application of a cold sterilant in the whelping areas, but does not specify when or at what frequency this procedure is completed. The facility operations manager stated that the animal enclosures in the whelping area are only sanitized between litters (approximately every 6 weeks). The facility operations manager stated that while cages and runs are in use, they are spot cleaned daily or as needed using a degreaser (GP-100) which does not have disinfection properties.

The second cleaning procedure, "General Husbandry of the Whelping Area" (EGS-SOP-PRD-6521) states that cages are scrubbed daily with a disinfectant. However, the facility operations manager stated that employees currently use GP-100 as a degreaser to clean cages, but this product is not a disinfectant. The water temperature used for cleaning is not specified or monitored/recorded. The facility operations manager stated that cages and runs in the whelping area are disinfected in between litters (approximately every 6 weeks).

Buildings G1, G2, and G3 are cleaned in accordance with the procedure for "Sanitation methods and frequency of indoor/outdoor facilities using the Landa stationary pressure washer" (EGS-SOP-PRD-6526). That SOP states that indoor/outdoor runs are cleaned with 180 degree Fahrenheit water at least every two weeks, but there is no detergent or

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soap utilized in this cleaning process. The facility operations manager stated that the degreaser (GP-100) used elsewhere in the facility was not used in the broodstock building (G1, which house approximately 1100 adult dogs) due to concerns about its potential impact on fertility.

Cleaning and disinfection is essential for removing waste and killing germs that can cause disease. Inadequate cleaning and disinfection may lead to animal sickness, outbreaks of disease, or proliferation of pests.

Correct by August 7th, 2021 by cleaning and disinfecting facilities in accordance with the Animal Welfare Act.

3.11(d)

Cleaning, sanitization, housekeeping, and pest control.

There is an extensive, widespread pest problem throughout all animal-housing buildings at the facility.

There are live spiders and house flies in the building G3, most abundantly in rooms 1 and 2. Live spiders and spider webs were present throughout this building on ceilings, in corners, in windows, and at the tops of dog runs containing dogs. Spider and spiderwebs were also present in drains, on equipment, and on overhead heating lamp structures.

Building G3 also has large numbers of ants present on the floor and adjacent to self-feeders mounted on the front of kennels. Live ants were observed going in and out of self feeders containing dog food for dogs.

House flies were present throughout all animal housing buildings at the facility (G1, G2, G3, and 96/97). Live flies were present in moderate numbers on the walls, ceilings, floors, and flying in the air. Upon lifting the lid on many self-feeders containing dog food, flies often emerged or were seen crawling on food within the feeders. Flies were extremely numerous in Building G2, on the walls behind the enclosures.

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In Building G1 live black hairy worm-type insects and live black beetles were present in the metal self-feeders (which contained dog food) which were mounted to sides of kennels containing dogs. These self feeders were the only source of food for the dogs. These live black worm-type insects, along with live black beetles, were observed in amongst the dog food contained in a large silo/hopper outside building G1. In Building G2, numerous live black worm-type insects were also present in metal self-feeders, and a large bulk feed container in a food storage room.

There were a very large number of live flies ('sewer flies') in all of the whelping rooms containing live dogs in building 97 (rooms 7, 10, 11, 13). The flies were observed on the walls, ceilings, flying in the air, and in the drains in the rooms housing dogs. In Building G1, numerous 'sewer flies' were also present on the walls behind kennels.

Insects which contaminate feed can decreased nutritive value of the feed and/or result in reduced feed consumption. Insect infestation in other areas may irritate animals and/or can spread disease.

Correct by August 15, 2021 by maintaining an effective program to control pests including insects and spiders.

3.13(b)(2)

Veterinary care for dogs.

Medical records are not complete for numerous dogs. For example:

*CLACJP, an 11-month old male, had a laceration by a leg caught in the run on 01/03/21. The location and description of the injury are not recorded.

*CMBCDM, a 4-month-old male, had a fracture on 06/10/21. The location and type of fracture is not recorded.

*CMACK, a 4-month-old male, had a fracture on 06/04/21. The location and type of fracture is not recorded.

*CLGCTT, a 9-month old female, had a fracture on 04/23/21. The location and type of the fracture is not recorded.

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*CFEDDY, a 7-year-old female, had a fracture on 06/14/21. The location and type of the fracture is not recorded.

*In addition to these 4 animals with fractures, two other animals were identified in the mortality logs as having been euthanized due to fractures (CLGCHJ a 7-month old female beagle with a broken right rear leg identified on 2/3/2021 and CLDCAH a 1-year old male beagle identified on 4/23/2021 with a broken tail). When the attending veterinarian was asked about how 6 dogs experienced fractures during this period, she stated that she had investigated a nutritional cause, but that she hadn't been able to determine any cause with certainty. Fractures and lacerations may result from improper handling, unsafe primary enclosures, incompatibility of animals, improper nutrition, or many other causes. Failure to maintain complete and accurate medical records for dogs prevents the attending veterinarian from determining the cause of these injuries and implementing preventive measures. Additionally, this lack of accurate complete record keeping prevents APHIS Officials from determining the facility's compliance with other regulations and standards within the Animal Welfare Act.

*CJKCGC, a 2-year-old female, is listed on the mortality log with a cause of death as "other" on 04/20/21. The animal's individual record contains no information about the animal's death; the record only contains general husbandry information.

*CLBCJF, a 1-year-old female, is listed on the mortality log with a cause of death as "other" on 04/02/21. The animal's individual record contains no information about the animal's death; the record only contains general husbandry information.

During inspection the Attending Veterinarian stated that staff is supposed to notify her when adult dogs are found dead so she can perform a necropsy examination. There is no record of the results for such necropsy examination included in the medical record for either of these two animals.

*CKHCDL, a 1-year-old female, is listed on the mortality log with a cause of death as "pull" (pull injury) on 06/24/21. The

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animal's individual record contains no information about the animal's death; the record only contains general husbandry information.

Complete and Accurate medical records are important for the ensuring provision and continuity of veterinary care, communication with the animal care team, prevention of medical errors, and analysis of animal health. Lack of complete and accurate medical records may result in failure to identify adverse trends in animal health, medical errors, and lack of medical care.

Correct by 08/30/21 by maintaining records for all dogs that include a date and description of problems identified, examination findings, test results, plans for treatment and care, and treatments performed.

This inspection was conducted with the Operations Manager and the Attending Veterinarian.

The exit interview were conducted with the Operations Manager, Attending Veterinarian, Site Director, Regional Quality Assurance Manager, Director of Quality Assurance, Senior Vice President for Veterinary Services, Chief Operations Officer, and Regional Facilities Manager.

This is a continuation of the report for the routine inspection conducted 07/20/21-7/22/2021 and contains the remaining non-compliances found during the inspection from 7/20/2021 to 7/30/2021. The exit briefing for the items included on this report was conducted on 7/30/2021.

Additional Inspectors:

Rachel Perez-Baum, VETERINARY MEDICAL OFFICER

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**Species Inspected**

Cust No	Cert No	Site	Site Name	Inspection
506554	32-A-0774	005	ENVIGO RMS LLC	20-JUL-2021

Count	Scientific Name	Common Name
003021	<i>Canis lupus familiaris</i>	DOG ADULT
002014	<i>Canis lupus familiaris</i>	DOG PUPPY
005035	Total	



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Type: ROUTINE INSPECTION
Date: 20-JUL-2021

2.40(b)(3) Direct

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

15 animals had medical problems that had not been identified or treated by the facility prior to the inspection.

July 20th, 2021:

***An adult female beagle (CLDCCL) had an abnormal right eye. There was a moderate amount of thick greenish yellow discharge around the edge of the eye. The membrane at the inner corner of the eye was protruding ("cherry eye"). The surface of the eye was slightly grey and there was an irregular, roughened area approximately ¼ inch diameter within this grey area near the inner corner of the eye. This eye condition was not previously identified by the facility and the dog was not receiving any treatments for the eye. The attending veterinarian examined the dog and stated that the eye condition was likely not present for more than two days, and treatment was started for the eye condition.

***An adult female beagle (CGDCEX) had severe dental disease. The back 4 upper teeth on the left side were completely covered with hard, brown tartar and the gums were red. There was hair embedded in the tartar. The right upper canine tooth was 50% covered with tartar, and the gums adjacent to the tooth were inflamed. The 2 back upper teeth on the right side were 90% covered with hard, brown tartar, and there was hair embedded in the tartar. The gums were red. The attending veterinarian examined the dog and stated that the dog had severe dental disease. The animal last had a dental cleaning in May 2019.

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***An adult female beagle (CGGCAE) was itching her right ear continuously. When the ear flap was lifted, the ear canal was thickened, reddened, and there was a brown waxy debris in the ear. The left ear canal was also thickened, reddened, and contained waxy brown debris and a small amount of clear discharge. There were small red scabs on the outside of both the right and left ears. The facility had not previously identified this dog's ear condition and the dog was not currently being treated for its ear condition, but the facility started treatment during the inspection.

***One adult female beagle (CKKCPZ) had a skin issue. The dog had patchy hair loss and a thinning coat along with some scabs affecting approximately 70% of the right side of the dog's rib cage and side. The skin appeared mildly irritated and red. According to the attending veterinarian, the dog's skin condition had not been observed previously and the dog was not being treated for this condition, and treatment was started the same day.

***One adult beagle (CNACDX) was identified with large quantities of fur stuck on the bottoms of the front paws and between the toes of these paws. On examination, an approximately 1-inch diameter area of hair loss with yellow crusts and red skin was identified at the tail base. The hair surrounding this area was crusty. According to the attending veterinarian, the dog's skin condition had not been observed previously and the dog was not being treated for this condition, but treatment was started the same day.

***One adult female beagle (CFECGS) in the broodstock area (G1, room #10) had severe dental disease. The 2 upper left back teeth were completely covered with hard brown tartar, and there were pieces of hair in the tartar. The gums above these teeth were red and bled slightly when touched. The dog was prioritized for a dental cleaning.

***One adult female beagle (CICCYS) in the broodstock area (G1, room #10) had severe dental disease. There was gingivitis, gum recession, and some hair in the tartar. The attending vet examined the dog's teeth and agreed that severe dental disease was present.

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***One adult female beagle (CLGCST) located in G2, room 2, kennel #44, had a wound on the outer surface of her left ear. The wound was approximately 1 inch long and ½ inch wide, and was covered by a dark brown scab. The scab had pulled away from the ear on the front edge and there was a small amount of red and pink milky fluid in the area. There was a small amount of patchy hair loss at the base of the ear. Facility personnel had not previously identified this lesion, and began treatment immediately.

***One male puppy (CMCCIZ) located in G2, room 3, kennel #73, was reluctant to bear weight on the right front foot. The underside of each of the middle two toes on the front right foot had a small circular red area approximately 1/3 inch in diameter. There were yellow crusts or scabs on the underside of all four toes on this foot. Facility personnel had not previously identified this lesion, and began treatment immediately.

***One adult male beagle (CKDCBZ) located in G2, Room 8, Kennel 48, was reluctant to stand and bear weight on his left rear leg. He would stand for a short period of time and then lay down, despite his cage mates jumping around excitedly. This toe was swollen, and skin in the area between this toe and the next was red. The toe nail was curved tightly against the underlying pad. The attending veterinarian further trimmed the nail on this toe and there was a depression left in the toe pad where the nail had been. Facility personnel had not previously identified this issue, and created a treatment plan immediately and was given pain medication the same day.

***One adult female beagle (CGASCD), located in G1, Room 3, Kennel #24, had severe dental disease and a skin issue. On both sides of the mouth, the upper back teeth were completely covered in a hard brown tartar, the adjacent gums were red, swollen, and had pulled back from the teeth. On the right side, there was a greyish substance along the gum line. On the left side of the dog's neck, where the neck meets the lower jaw, there was an yellowish brown scab approximately 1 inch wide and 1.5 inches long. The skin around the edges of the scab was hairless and red, and there was a small amount of clear fluid at the center of the scab. Facility personnel had not previously identified this issue, and

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created a treatment plan immediately.

***One adult female beagle (CFHCAS), located in G1, room 4, kennel 23, had severe dental disease. On the left side of the mouth, the upper back teeth were completely covered in hard brown tartar, and there was hair stuck in the tartar. The adjacent gums were red and swollen and pulling away from the teeth. On the right side of the mouth, the upper middle teeth were completely covered in hard brown tartar, and the gums were swollen and had pulled back from some of the teeth exposing the roots of the teeth. There was greyish material along the gum line. Facility personnel had not previously identified this issue. The dog was prioritized for a dental cleaning.

*** In Building G2, Room 1, an adult female beagle (CLACHJ) has a large, firm, pink and swollen area of skin between the 3rd and 4th toes of her right front paw. The cyst was approximately 1" in length and approximately 70-80% the length of the toes. She was reluctant to bear her full weight on the right front limb. According to the attending veterinarian, the condition was not previously identified by the facility and no treatments had been initiated prior to the time of observation. The dog received treatment immediately.

***In Building G2, Room 5, an adult male beagle (CMBCIA) has discharge in the left eye. The eye has milky, yellow discharge around the edges and there are crusts on the surrounding eyelid. The eye and surrounding tissues were mildly inflamed and red. The condition was not previously identified by the facility and treatment began immediately.

***In Building G1, Room 3, an adult female beagle (CHICPT) has a large amount of patchy hair loss encompassing approximately 80% of her entire coat. The hair loss is primarily over the trunk, sides, and top side of her tail. There are several small yellow scabs spread throughout the hair loss and the skin is red over the tail where the hair is missing. She was not found scratching or chewing during inspection. According to the attending veterinarian, this issue had not been observed and the dog had not been started on any medical treatment prior to the inspection. The attending veterinarian examined the dog and created a treatment plan.

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Animals with medical conditions including eye, skin, ear, and dental problems, may suffer from pain, discomfort, infection, and stress. Daily observation of animals to identify medical problems is essential for animal health and welfare.

Correct by July 23, 2021 by observing animals on a daily basis to identify physical, medical or behavioral problems, and communicate all findings to the attending veterinarian promptly.

2.131(b)(1) Direct

Handling of animals.

***In Building 97, Room 15, at 1:36 PM on 07/20/21, a 3-week-old male puppy was found in the pan below cage # 97-11-15. The puppy was huddled, depressed and not actively vocalizing or searching for his dam. He had dried excreta in his fur. When handled he remained listless and quiet. Upon removing the puppy from the pan and replacing him into the cage above, with his dam (CHBCMX), he immediately began crawling towards the rest of the litter. According to the facility operations manager, the room had been cleaned around 9 AM that morning and this puppy belonged in the cage above the tray where he was found. The facility operations manager indicated that this puppy must have fallen into the tray during the morning cleaning. There are no gaps or areas where the puppy could fall out of the cage when the cage door is closed. The puppy was immediately examined and treated by the attending veterinarian.

Young puppies who fall into trays below their cage may become distressed, cold, hungry, dehydrated, or contaminated with feces and urine.

Correct by July 23rd, 2021 by ensuring all puppies are handled expeditiously and carefully in a manner that does not cause excessive cooling, behavioral stress, or unnecessary discomfort. This noncompliance was discussed with facility management and the facility took steps to address this issue immediately.

***13 nursing adult female beagles, housed in individual cages with their litters of 6-week old puppies (78 total), were fasted for 42 hours. The facility representatives stated that this reduces milk production and is part of their current standard operating procedure for weaning which they believe reduces the risk of mastitis. This was conducted in

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accordance with the facility's "Weaning of puppies" procedure (EGS-SOP-PRD-6616). Metal automatic food dispensers (self-feeders) which were normally mounted on the doors of each cage were turned around and left on the doors of the cage, so that the dogs could see and smell the food but could not eat it. Many of these self-feeders did not have lids, so the dog food was visible through the uncovered top of the feeders. Food access was removed on Monday (07/19/21) after noon, and food access was returned to the dogs on Wednesday (07/21/21) beginning around 6AM when the females were separated from their litters and moved to a different housing area. The inspectors initially observed the dogs at approximately 12PM on Tuesday, 7/20/21. Three dams were observed to be reaching their front paws through the doors of the cages to reach the food in the top of their feeders, these dogs were seen trying to scoop or dig out food from the feeders but could only retrieve the occasional piece of kibble. One dam was observed to be vigorously licking the back of the self-feeder, another was observed intently smelling the side of the feeder.

Deprivation of food causes stress, hunger, and anxiety. Placing the food where it can be seen, smelled, and in some cases touched by dogs while the dogs are fasting is causing unnecessary distress and anxiety. Correct by July 23rd, 2021 by ensuring that dogs are handled in a manner that does not cause unnecessary discomfort and/or behavioral stress. This noncompliance was discussed with facility management at the time of initial observation on Tuesday 7/20/2021.

3.3(a) Direct

Sheltered housing facilities.

Puppies and adult dogs were housed in sheltered housing facilities in which the temperature inside the sheltered area exceeded 85 degrees Fahrenheit for at least 5 hours.

The temperature was measured in multiple locations in the following rooms:

Building G2, Room 3 (contains 543 puppies and 21 adults including some that are currently receiving medical treatment for minor conditions):

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86.4F, 86.1F, and 86.0F at 11:40AM

89.4F, 89.1F, and 89.2F at 1:30PM

90.5F, 90.3F, 90.2F at 2:36PM

90.8F, 90.7F, 90.8F at 3:42PM

91.3F, 91.2F, 91.0F at 4:55PM

Building G2, Room 2 (contains 112 adult dogs, 219 puppies)

86.4F, 86.2F, and 86.2F at 11:42AM

88.7F, 89.0F, 89.1F at 1:33PM

90.2F, 90.1F, 90.2F at 2:33PM

90.7F, 90.8F, 90.7F at 3:39PM

92.3F, 92.2F, 91.8F at 4:53PM

Building G2, Room 1 (contains 319 dogs)

86F at 11:45AM

88.7F, 88.8F, and 88.9F at 1:36PM

90.0F, 89.1F, 90.1F at 2:31PM

92.0F, 91.8F, 91.9F at 3:37PM

92.3, 92.1, 92.0 at 4:49PM

The outdoor ambient temperature taken mainly in shaded areas were 89F at 11:48AM, 91F at 2PM, 92.3F at 2:30PM, and 92.7F at 4:15PM.

Other buildings, which are constructed in the same way and in which the temperature is managed in the same way, were of similar ambient temperatures in their sheltered areas throughout the day. G2 building, room 8 was 89.0F at 1:18PM.

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G1 building, room 1 was 89.9F at 3:03PM. G1 building, room 4 was 90.1F inside at 4:11PM. G1 building, room 5 (which contained a very small number of dogs) was 88.4F at 4:20PM.

Each room had a large fan at one end and two exhaust fans at the other end. There is no air conditioning or other mechanism in place for cooling this building. The facility stated that they typically monitor temperatures once daily at approximately 7 AM. The adult dogs within the buildings were easily excited by the presence of USDA personnel, and were usually jumping, barking, and panting excitedly when inspectors were present. When USDA personnel returned to the rooms throughout the afternoon as temperatures increased, both dogs and puppies were observed to be sleeping. When sleeping, the dogs were avoiding contact and were splayed out not touching each other. Puppies were frequently observed sleeping on the cinderblock at the bottom of the door between the inside and outside of the kennel. Dogs that were awake and not barking or overly excited were often observed to be panting.

Dogs who are hot may experience discomfort, lethargy, or stress. Puppies and dogs with medical problems are especially vulnerable to the effects of hot weather.

Correct by July 26th, 2021 by providing additional / alternate cooling mechanisms that ensure ambient temperatures that do not exceed 85F for more than 4 consecutive hours when dogs are present, and that adequately provides for animal comfort and wellbeing.

3.6(a)(2)(x) Direct

Primary enclosures.

In the G3 building, Rooms 1 and 2, the floors in the cages have a grid pattern with openings large enough for young puppies feet to pass through. There are approximately 200 puppies housed with their respective dams in indoor housing comprised of raised plastic-coated metal grate-type flooring. The grid pattern openings in the flooring allow the puppies feet to fall through the flooring up to their shoulders. Three puppies were observed with their limbs through the floor, and these puppies were able to remove their limbs and move around the cage.

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In the sheltered area of kennels in G2, Room 3, there were two kennels with a total of 13 puppies. In one kennel, two puppies were sleeping at the front of the sheltered area of the kennel. The puppies were leaning against the front gate and their front paws were passing down through a gap between the raised grate floor and the bottom of the gate. In the second kennel, three puppies were up at the front gate and walking back and forth. At least four times their back limb and front limbs fell down between the raised grate floor and the gate. Puppies whose limbs passed through this gap between the floor and the bottom of the gate would sink down to their shoulders or hips and could touch the edge of the cement slab below.

In Building G1, Room 3, an adult female beagle (CJICFN) was standing on the outside of the kennel. The dog's left front paw was caught in the raised plastic-coated grate flooring. Her two middle toes were caught in a thin rectangular opening in the grate floor and she was unable to free her foot. She was standing on her other three feet while panting rapidly and making small movements, as the other 3 dogs in the kennel jumped around her excitedly. It took two facility personnel approximately 3 minutes to free the dog's toes from the opening in the floor. Once the toes were free, the dog was examined more closely and the two toes were red and swollen. The facility provided immediate veterinary care. Facility personnel did not know how long the dog's toes had been stuck in the floor. Medical records indicated that the animal was mildly dehydrated.

Raised mesh or slatted flooring that contains openings that are wide enough for a limb, paw, or digit to pass through can lead to an animal becoming trapped or injured. When an animal becomes entrapped as described above, they can become distressed, dehydrated, or may suffer additional injuries.

Correct by 07/30/21 by ensuring that mesh or slat flooring does not allow the animals' feet or legs to pass through and that all flooring is constructed in a manner that protects their feet and legs from injury.

3.6(c)(1)(ii) **Direct**

Primary enclosures.

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Inspection Report

62 nursing female dogs (and a total of 393 puppies) in the whelping building (building 97) were housed in cages that did not provide the minimum amount of floor space for the dam and her litter as required by the Animal Welfare Act.

Room 7 has dams housed with their litters in cages that measure 33 inches by 36 inches providing a total floor space of 1,188 square inches. The following dams were identified and measured from nose to base of tail:

CJKCNN measured 28" and has 7 puppies

CIHCLC measured 26" and has 7 puppies

CIJCCF measured 25" and has 5 puppies

CJGCAU measured 28" and has 4 puppies

CKICGJ measured 25" and has 6 puppies

CLDCDA measured 26" and has 6 puppies

CGDCEX measured 25" and has 6 puppies

Additional dams with litters who did have enough floor space were identified in Room 7, Room 10, Room 11, and Room 13. The facility staff stated that the dogs are a consistent size (average female is 25-28 inches). Each of these 62 female dogs had 5 to 9 puppies.

CJKCNN with her seven puppies, requires a minimum floor space of 1560.6 sq.in. The enclosure requires an additional 372 sq.in. of space for compliance with the AWA. CIJCCF, with her five puppies, requires a minimum floor space of 1201.25 sq.in. The enclosure requires an additional 13 sq.in. of space for compliance with the AWA.

Dams and puppies without the minimum amount of floor space may suffer from distress, discomfort, crowding, poor sanitation, increased trauma and mortality.

Correct by July 30th, 2021 by ensuring that all dams and litters are provided with at least the amount of floor space required under the Animal Welfare Act. This issue was identified to the facility during inspection on 7/20/21.

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Inspection Report

3.9(a) Direct

Feeding

***13 litters of 6-week-old beagle puppies were kept with their mothers (dams) while the dams were fasted (did not have food) for 42 hours. Facility representatives stated the purpose of the fast was to decrease milk production and reduce the risk of mastitis for the mother dogs. This was conducted in accordance with the facility's "Weaning of puppies" procedure (EGS-SOP-PRD-6616). The puppies only source of food was to nurse on the mother dogs, who were experiencing decreased milk production. Puppies were observed vocalizing and nursing on their mothers, while the mothers stood and tried to gain access to the food outside their cage.

Puppies who have no food source aside from a dam that is on a program to reduce (and eventually halt) milk production may not get enough nutrition, causing the puppies to experience hunger, dehydration, stress, increased susceptibility to infections, and low blood sugar.

Correct by July 23rd, 2021 by ensuring that puppies and dogs are fed in a manner that provides a sufficient amount of wholesome food and nutrition for their age and condition.

***Food in the self-feeders and feed silo in G1 building, and food in self feeders and storage areas in the G2 building were contaminated with a variety of live insects. Live small black worm-type insects were observed in the feed silo and in four self-feeders. Approximately 5 feeders contained live small black beetle-type insects. Flies were present inside many of the self feeders, and were observed landing on the feed in those feeders. Facility operations management stated that feed is added to the feeders every other day, or when food levels were low, and that the self feeders were sanitized every 2 weeks. Facility operations management stated that currently the hopper is cleaned at least twice a year.

Feed infested with insects is not considered wholesome and palatable and may lead to reduced feed consumption or poor nutrition. Correct by July 23, 2021 by ensuring that all feed offered to dogs is uncontaminated, wholesome, palatable, and of sufficient quantity and nutritive value. The following day the facility provided alternative, uncontaminated feed to the

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dogs in G1.

This noncompliance was discussed with facility management at the time of inspection.

3.12 **Direct**

Employees

Daily observation failed to identify 15 dogs with medical issues prior to the inspection. A treatment plan was created for each of these dogs following identification by APHIS inspectors, however, there are currently not sufficient employees to recognize these issues effectively. Daily observations regarding veterinary care are made by 6 trained staff members who conduct daily observation in addition to other duties including treatments and husbandry; 3-4 of these employees conduct daily observations each day.

Several animals were found in need of critical care. This included the puppy found by inspectors under the enclosure in the tray used for urine and feces collection and the adult dog with the toes entrapped in the slat flooring. Although both animals received care immediately, they were not identified by animal care staff responsible for providing husbandry care. Two cage cards, and one puppy, were missing from nursery cages. Sheltered housing facilities were not being managed in accordance with the written temperature SOP. The facility currently employs 39 personnel for over 5000 dogs, and there are 5 vacancies which remain unfilled.

Only one attending veterinarian is employed to oversee care for all of the dogs and cats well as assisting in research projects.

Adequate staffing is essential for carrying out the level of husbandry and care required to maintain animal health, welfare, and facility maintenance and sanitation.

Correct by August 31, 2021 by maintaining enough personnel to carry out the level of husbandry practices and care required by the Animal Welfare Act and to assure animal health and wellbeing.

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Inspection Report

A complete routine inspection was conducted starting on 7/20/2021. This inspection report is limited to the Direct non-compliances identified during that inspection. An additional inspection report will be delivered with the other issues identified during this inspection.

This inspection was conducted with the Manager of Operations and Attending Veterinarian. The exit briefing was conducted on July 22nd, 2021 with the Manager of Operations, the Attending Veterinarian, the Senior Vice President for Vet Services, the Director of Quality Assurance, the Regional Quality Assurance Manager, the Regional Facilities Manager, the Vice President of North American Operations, and the Chief Operating Officer.

Additional Inspectors:

Rachel Perez-Baum, VETERINARY MEDICAL OFFICER

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Title: VETERINARY MEDICAL OFFICER USDA, APHIS, Animal Care

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**Species Inspected**

Cust No	Cert No	Site	Site Name	Inspection
506554	32-A-0774	005	ENVIGO RMS LLC	20-JUL-2021

Count	Scientific Name	Common Name
003021	<i>Canis lupus familiaris</i>	DOG ADULT
002014	<i>Canis lupus familiaris</i>	DOG PUPPY
005035	Total	



Inspection Report

ENVIGO RMS LLC
8520 Allison Pointe Blvd., Suite 400
INDIANAPOLIS, IN 46250

Customer ID: 506554
Certificate: 32-A-0774
Site: 005
ENVIGO RMS LLC

Type: FOCUSED INSPECTION
Date: 25-OCT-2021

2.40(a)(2) **Direct**

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

The facility failed to provide adequate authority to the attending veterinarian by treating three animals with medication not approved by the attending veterinarian (AV). The medical treatment records for 26 Oct 2021 showed that caretaker staff had identified three dogs as being too thin (CGDDBN, CJFCLZ, CLHCHF). These records also indicated that a medication (later identified by the attending veterinarian as Cefpodoxime) had been given to these dogs that day. Medical records did not show that a veterinarian had been consulted regarding the diagnosis of thin body condition or prescription of medications to these dogs. There was no guidance in the program of veterinary care allowing caretaker staff to start this medication on dogs they perceived as too thin. The AV verified that she did not prescribe this medication for these dogs nor would she prescribe this for a dog with only a thin body condition. When APHIS officials brought this to the attention of the AV, she completed an examination on these dogs and directed the antibiotics be stopped. Employees who diagnose and prescribe treatment for animals without consulting the AV are undermining the authority of the AV to ensure the provision of adequate veterinary care for the animals. Correct by ensuring that the AV has adequate authority to ensure the provision of veterinary care and to oversee all other aspects of animal care and use. Additionally, ensure that timely and accurate information concerning health of the dogs is communicated to the attending veterinarian in

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accordance with section 2.40(b)(3) so that appropriate methods are used to diagnose and treat all diseases and injuries as required by section 2.40(b)(2). Correct by November 5, 2021

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

Adult, female beagle (CIACNG) was squinting her right eye and had extensive tear staining and clear discharge around and under her right eye. There were small eyelashes pointing down from the upper lid toward the surface of her eye. This dog received a physical exam on 4 Oct 2021. The physical exam findings documented at that time were consistent with the eye problems seen during the inspection. The veterinarian documented on the physical exam form that the action for this dog was "cull". The facility was unable to provide any documentation showing that this dog had received any kind of treatment since the diagnosis was made during the physical exam on 4 Oct and, as of the time of the inspection, had not been "culled" or otherwise disposed of through either adoption, sale, or euthanasia. This dog's symptoms are consistent with untreated conditions resulting in eye pain. While the condition was diagnosed by the veterinarian, the disease was not treated. The licensee must use appropriate methods to prevent, control, diagnose, and treat diseases and injuries.

2.40(b)(3) Direct Repeat

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

Three dogs had medical conditions that had not been identified or treated by the facility prior to the inspection.

October 25, 2021:

*** A male beagle puppy (CMHCKL) has an abnormal left eye. There was yellow-green discharge present at the corner of the eye with dried discharge surrounding the eye. The membrane at the inner corner of the eye was extended slightly and there was increased tearing present. This eye condition was not previously identified by the facility and the dog was not receiving any treatments for the eye. The facility examined the dog and immediately began treatment for an eye infection.

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*** An adult female beagle (CKJCAZ) has a medium firm, pink, and swollen area of tissue between the 4th and 5th toes of her right rear paw. The swelling was approximately 1/3" in diameter and the inflamed tissue was easy to visualize from a distance. The condition was not previously identified by the facility and the dog was not receiving any treatments for the foot. The facility examined the dog and immediately began treatment for an interdigital cyst.

October 26, 2021:

*** An adult female beagle (CGHCAC) has multiple skin lesions on all four feet. The hair between all four feet was discolored red, commonly seen with licking/chewing due to the presence of saliva. On the left front paw there was a small firm and swollen area of tissue between digits 3+4, and a large firm, swollen, and pink area of tissue between digits 2+3. The larger swelling also has a scab present closest to the toe. On the right front paw there is thickening present in the crevice of skin between the 4th + 5th toes with pink skin and a small scab. There is a medium firm, pink, and swollen area of tissue between digits 3+4 with yellow crusts attached and an oozing sore on the top surface. There is also thickening and inflammation of the skin on the 5th digit between digits 4+5 with two more scabs present. On the left rear paw there is swelling of the skin on digit 4 between digits 4+5 with an open wound on the top surface and partial scabbing. In between digits 3+4 there is a lot of inflamed, pink, and thickened skin with numerous crusts/scabs on the front edge of the toe and an exposed raw area of skin. Between digits 2+3 there is a medium firm, swollen, and pink area of tissue with a scab on the top surface. On the right rear paw there is a small firm, swollen, and dark pink area of tissue with white flaking crusts between digits 2+3. The condition was not previously identified by the facility and the dog was not receiving any treatments for her feet. The facility examined the dog and began treatment.

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Animals with medical conditions including eye and skin problems may suffer from pain, discomfort, infection, and stress.

Daily observations of animals to identify medical problems is essential for animal health and welfare. The licensee must observe all animals at least daily to identify physical, medical, or behavioral problems. Additionally, ensure that all findings are communicated in a timely manner to the attending veterinarian so that they can examine animals and ensure that appropriate treatment is provided as required by section 2.40(b)(2) and further, that the findings are documented in accordance with section 3.13.

2.75(a)(1) Repeat

Records: Dealers and exhibitors.

The facility still does not have complete acquisition or disposition records for their animals. Facility records, known as Inventory Change Notices, are used to record newborn puppy numbers, procedures performed, and changes in puppy numbers due to euthanasia or death. The facility continues to have animals which are no longer present for unknown reasons that they have stated to be clerical errors.

***Records indicate that a female puppy born on 9-27-2021, from the dam CIICMP, was not present during a litter count conducted on 10-14-2021. The original litter count was 4 males and 5 females. On 10-14 there were only 4 males and 4 females. There was no record of this puppy dying or being euthanized which would account for its absence. When the facility was asked as to the status of the missing female puppy, they were unable to determine if the original puppy count was wrong (i.e., there were only 4 males and 4 females at birth) or if a female puppy has truly been lost. If the puppy has been lost, the facility does not know how or when.

***On 4 November the facility's Manager of Operations disclosed that she recalled a neonate puppy was found in the drain under an enclosure on 13 October 2021. The puppy was removed from the drain and subsequently died later that

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day. This puppy had not been given an acquisition number and was not included in the acquisition records provided earlier to inspectors. There was no record of this puppy included in the "mortality logs" or other disposition records provided by the facility to inspectors. When asked, the Operations Manager stated that that she was not sure why it had not been included, but perhaps the employees were "not sure how to code it".

Accurate and complete recordkeeping of all acquisitions and dispositions is important for animal identification, traceability or animals, animal loss, and investigation of disease outbreaks or animal theft. Correct by maintaining records that fully and accurately document all dogs and cats acquired by the facility (through birth, purchase, or other method) and all animals that are disposed of (by sale, death, euthanasia, or other method) including all information required in this section.

Handling of animals.

Animals have not been handled as carefully and expeditiously as possible leading to subsequent death.

*** According to the manager of operations, a newborn puppy was found in the drains below the kennels on 10-13-2021. The Manager of Operations explained that the facility had recently laid down a new type of flooring on top of the existing kennel grate to enhance puppy safety. The manager believes that the puppy fell into the drain because one dam (CKJCCT) had shifted a piece of the flooring, exposing a gap, and whelped on top of the old flooring. The puppy was found between 1-2 pm and immediately brought to the clinic for a bath and was returned to the above dam who had recently whelped near where the puppy was found. The puppy was also provided supplemental heat but died later that day. The Manager of Operations stated that in response to this incident, employees replaced the flooring and added paper to the back of the kennels to prevent another occurrence.

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*** Mortality records show that a 7-week-old puppy (CLICBE) was found deceased on 21 Oct 2020 with its head stuck in the swinging kennel door of a bedded whelping run. Facility representatives state that an investigation of the incident was completed at the time, but they do not have access to the files from previous management. It was determined that the entrapment and subsequent death was a result of employee error. The employee has since been terminated. Failure to handle animals as carefully and expeditiously as possible can lead to injury or death. Employees must take special care when working with small puppies as they are more easily overlooked and seriously injured. The licensee must ensure all animals are handled expeditiously and carefully in a manner that does not cause physical harm, trauma, or unnecessary discomfort.

Failure to handle animals as carefully and expeditiously as possible can lead to injury or death. Employees must take special care when working with small puppies as they are more easily overlooked and seriously injured. The licensee must ensure all animals are handled expeditiously and carefully in a manner that does not cause physical harm, trauma, or unnecessary discomfort.

3.1(c)(3)

Housing facilities, general.

The facility has surfaces in contact with the dogs that are not being spot-cleaned frequently enough to prevent the buildup of grime and dirt and to reduce disease hazards. In multiple enclosures, the outer cement walls housing the dog doors have brown dirt/grime built up. According to the facility, the outdoor enclosures are hosed down once per day with either a pressure washer or a routine hose. Every two weeks the enclosures are sanitized using a product called "Intervention." Due to the accumulations of dirt and debris on the walls, it is evident that the facility is not spot-cleaning or sanitizing effectively to prevent accumulations or to reduce disease hazards.

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Buildup of feces, dirt, and grime on a surface accessible to the dogs exposes them to unnecessary disease hazards and does not satisfy generally accepted husbandry standards and practices. Correct by November 8, 2021 by ensuring all surfaces in contact with the dogs are spot-cleaned daily and sanitized in accordance with this Subpart.

3.6(a)(2)(ii) Direct Repeat

Primary enclosures.

Mortality records show that from 2 Aug 2021 to 3 Oct 2021, nine dogs (CLCCVA, CLBCES, CLFCAB, CLCCUU, CLLCGK, CLLCGS, CLACJT, CLCCIN, and CLECRN) were injured from having a body part (such as a limb or tail) pulled through the wall of the kennel by a dog in an adjacent kennel and bitten. The exact injuries varied in each case, however regardless of whether it was a minor or substantial injury, these nine dogs were subsequently euthanized. Dogs sustaining injuries from being pulled through the enclosure wall have experienced physical harm and unnecessary pain. The facility must ensure that all primary enclosures protect the dogs from injury.

3.6(a)(2)(x) Repeat

Primary enclosures.

The flooring in G2 which houses puppies from about 6 weeks and older still uses flooring that allows young puppies' feet and legs to pass through the openings. The facility agreed, via conditions of a correction date extension approval, that they would cover the flooring in kennels housing young puppies with cardboard cage liners as a temporary measure and additionally that they would provide increased night monitoring of all animals until all noncompliant floors could be replaced. However, there were two enclosures seen during the inspection that did not have these in place or even the heavy butcher-type paper which was covering the floor in other enclosures. Inspectors witnessed multiple puppies with legs and feet passing through the openings in the floors of these enclosures. Raised mesh or slatted flooring that contains openings that are wide enough for a limb, paw, or digit to pass through can lead to an animal becoming trapped or injured. When an animal becomes entrapped, they can become distressed, dehydrated, or may suffer additional injuries.

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The facility must ensure that floors of primary enclosures are constructed and maintained in such a manner that does not allow dogs' feet and legs to pass through any openings.

3.7 Direct Repeat

Compatible grouping.

The facility is still having compatibility issues between dogs housed in groups.

October 26, 2021:

***Two adult female beagles (CIBCTG and CJACNF) being housed together had scabs covering multiple small puncture wounds/scrapes. CIBCTG had hair loss present on her back midline and wounds located on her right nose, right ear, left ear, and left cheek. After replacing CIBCTG in the kennel, she began biting and chasing her kennel mate (CJACNF). CJACNF had scabs/wounds on her right knee and inner left thigh. The biting and wounds had not been previously identified by the facility. When questioned, the facility stated that CIBCTG is currently in heat and may be picking fights with her kennel mates. When inspectors identified this issue, the facility representatives removed CIBCTG and placed her in a separate kennel. No steps have been implemented at the facility to prevent potential compatibility issues.

***Two adult female beagles were currently being treated for fight wounds that occurred on 10/25/2021. An adult female beagle (CJACRI) had fight wounds on her chest and left ear. The other adult female beagle (CGFCFA) had fight wounds on her rear end and right front shoulder. These dogs were removed from two different kennels subsequent to fights which resulted in these injuries. According to the facility representative, following a fight, the injured animal is removed and treated medically. Once they are healed, the animal is relocated to a new enclosure in the attempt to find more compatible kennel mates. If one dog is found to be involved in multiple fights and thought to be the aggressor, they may elect to euthanize due to temperament. There is currently no systematic pro-active attempt to identify incompatible animals

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through behavioral observation; rather, dogs are moved only after injuries are sustained.

***Facility records also show on 10/14/2021, a female dog CMHCAC was found dead. The mortality log and mortality record sheet from October 14th attributed the dog's death to evisceration (EVIS). CMHCAC was being cohoused with 9 other dogs approximately the same age (10 weeks old). According to the facility, the dog was found dead and the "littermates had chewed on it." The facility was unable to provide additional information when asked. There is no description of the lesions identified other than the facility code "EVIS" and no record of post-mortem examination findings. When inspectors asked to talk to the employee that found this puppy dead, they were informed she was unreachable due to leave. Dogs attacking/chewing on another dog, whether alive or deceased, is an uncommon behavior for dogs with adequate nutrition and likely indicates a compatibility issue.

Even though this facility continues to have compatibility problems in their group housed animals, there has been no action taken by the facility to proactively identify and potentially house separately those dogs that are incompatible or have an aggressive disposition. Failure to maintain compatible groups of dogs can lead to injuries, pain, and even death in the dogs. Correct this by ensuring all dogs are maintained in compatible groups.

3.11(a) Repeat

Cleaning, sanitization, housekeeping, and pest control.

The facility continues to have general sanitation problems with cleaning of enclosures, waste gutters, and odor control.

***At least two enclosures had old, dried, and moldy feces still present in the outdoor section. According to the facility, the lactating females inside do not currently have outdoor access. Additionally, an enclosure in Building G1 housing an adult male beagle contained at least nine to ten piles of feces in the outdoor portion, preventing him from accessing a majority of the outside run without stepping in his own waste and creating a disease hazard. Due to the presence of mold on some

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feces and the excessive number of feces in with the male, it is apparent that some of the enclosures are not being cleaned, at a minimum, daily.

*** In at least 50% of the rooms being used within Buildings G1 and G2 there are still accumulations of waste and an overpowering fecal odor that emanates from below the kennels. Significant accumulations of animal waste and fur on top of 2 pulley systems used to scrape solid waste underneath enclosures are contributing to the excessive odor in the facility. One waste gutter found in Building G2, outside Room 7 had a pile of feces stacked on top of the pulley system approximately 5-6" high. According to the facility, this happens when the gutters are drained and flushed prior to the facility power-washing the enclosures. Another waste gutter found in Building G1, inside Room 8 had a very large collection of fur and fecal matter piled on top of a pipe and the surrounding floor just in front of the pulley mechanism. The waste in the gutters below the main sheltered housing buildings of G1, G2, and G3 have been flushed out since the last inspection and, although the gutters contain much less waste, several waste gutters throughout the facility still had accumulations of feces and urine sitting under the kennels. According to the facility, the waste gutters are limited to being flushed once every other day due to water supply and storage on site.

***Throughout the facility there are areas where a strong sewage odor emanates from the waste gutters surrounding the rooms. The odor is not present at all rooms in a building, but every building has at least one or more rooms with a strong odor. The facility is aware of this issue and has been looking into possible causes and potential solutions.

Buildup of feces, urine, food waste and wastewater provide a breeding grounds for pests and insects and exposes the dogs to unnecessary disease hazards and noxious odors. The licensee must ensure that excreta and food waste is

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removed from and under primary enclosures as often as necessary and with a functioning system that reduces disease hazard, insects, pests, and odors.

3.11(d) Repeat

Cleaning, sanitization, housekeeping, and pest control.

There are still large numbers of dead flies and spiders noted throughout the facility especially in the corners of buildings, near drains, and in the storage areas. Additionally, some areas near drains have populations of small live black flies. The facility has changed pest control companies and there is an improvement in the number of pests found during this inspection. However, failure to remove dead pests makes it impossible to properly monitor the effectiveness of the pest control program. Correct by ensuring an effective pest control program is established and maintained.

3.12 Direct Repeat

Employees

The facility continues to have insufficient numbers of employees to successfully care for the animals. There continue to be severe staffing shortages and currently there are approximately 32 employees at the facility, with only 17 staff members directly responsible for all husbandry, daily observations, and medical treatments for almost 5000 dogs. Four dogs were identified by APHIS inspectors with medical conditions that required treatment and should have been found by staff during their daily observations. There are also numerous dogs that have been identified with severe periodontal disease by veterinarians and still require prescribed dental cleanings. Additionally, basic husbandry such as cleaning out kennels daily to remove feces, cleaning contact surfaces to prevent buildup of debris, and general housekeeping including dead pest removal is not being performed in accordance with the AWA regulations. The employees who are responsible for assessing animals for medical problems are also responsible for assisting with husbandry and cleaning. While the facility brought in temporary, visiting veterinary staff following the last inspection to assist in preventive medicine duties such as dentals and physical exams, the facility still has not completed all the needed procedures identified on those exams.

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There is still only one full-time veterinarian to oversee the daily medical care of all the animals as well as assisting with research projects. The facility must ensure that there are sufficient employees to carry out the level of husbandry practices and care required in this subpart.

3.13(b)(2) Repeat

Veterinary care for dogs.

Veterinary medical records are incomplete for at least 7 dogs. This includes:

*** Mortality records from August 14th and 15th, 2021 shows a list of three puppies coded as deceased from FALV (fatty liver) - CMGCAE, CMGCCZ, and CMGCAU, and two puppies as deceased from ENTE (enteritis) - CMFCYE and CMGCFA. All puppies were approximately 5-6 weeks old. When the complete medical record was requested for these animals, it only listed the facility's code for fatty liver and/or enteritis, respectively. Records indicate necropsies were performed on all these puppies however, there are no exam findings, description of lesions observed, or test results recorded. Additionally, there are no description of symptoms leading up to these animals' deaths. These are diagnoses that can't be made without either a history of symptoms or further diagnostic testing such as histopathology. There are no descriptions in the medical records of problems, daily observation of symptoms leading up to the death, examination findings, or test results listed for these puppies.

*** The mortality records for October 21, 2021 lists a puppy (CMICFA) coded deceased from FALV (fatty liver) and PNEU (pneumonia). The medical record for this puppy lists a mortality code of HPNE (hemorrhagic pneumonia) and FALV (fatty liver). Although, the record indicates a necropsy was performed on the puppy, descriptions of necropsy findings, specific observation, and descriptions of symptoms leading up to the animal's death are not present.

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*** The inventory change sheet and medical record for a puppy (210801001C) shows that it was euthanized due to DMGB (damage by bitch), a broken jaw on August 17, 2021. However, the medical record does not have physical exam findings, such as the location or severity of the fracture of the jaw, type of fracture, diagnostics performed, or test results.

*** Medical records and a treatment form for a 6-week-old puppy (CMFCPH) on August 5, 2021 indicate that the dog was "lame on all four legs" had a "broken left femur" but failed to contain additional physical examination findings, diagnostics, or test results. The facility representative who found the dog told inspectors that they observed a head tilt and the puppy's balance seemed off, but there was no obvious limping on any specific leg. The manager of operations stated that when the Attending Veterinarian examined the dog, she felt a "pop" in the puppy's left femur and suspected a fracture. The AV recommended euthanasia and the dog was subsequently euthanized. The medical records did not include any of the attending veterinarian's examination findings but rather a presumptive diagnosis.

***On 4 November 2021, the facility's Manager of Operations disclosed that a neonate puppy (less than 1 day old) was found in the drain under an enclosure on 13 October 2021. She stated that the puppy was retrieved and was provided a warming pad and was cleaned before being returned to an enclosure. The puppy died later that day. There is no medical record for this animal documenting an examination, treatment, or death of this puppy.

The presumptive diagnoses listed on the medical records are an incomplete record of all findings/lesions on physical exam, necropsy, diagnostic testing, or results. Due to incomplete records, the facility cannot determine the exact cause of death and therefore ensure the health of the entire colony. Additionally, these animals are coded with problems that present with clinical signs prior to death such as weakness, lethargy, coughing, heavy breathing, inappetence, diarrhea,

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and vomiting. The facility appears to have missed these clinical signs during daily observations as there are no records indicating problems found prior to death or treatments initiated.

Incomplete medical records do not allow the attending veterinarian to adequately assess the needs of individual animals as well as the medical needs of the colony as a whole. The licensee must ensure that if a problem is identified in a dog (such as disease, injury, or illness), the date and description of the problem, examination findings, test results, plan for treatment and care, and treatment procedures performed are recorded in the medical records. Additionally, daily observations must be made in accordance with 2.40(b)(3) to prevent unnecessary suffering and death in animals.

This inspection was conducted with the Site Director, Manager of Operations, Attending Veterinarian, and Supporting Veterinarian. The exit briefing was conducted with the Site Director, Manager of Operations, Attending Veterinarian, Supporting Veterinarian, Senior Vice President for Vet Services, the Director of Quality Assurance, the Regional Quality Assurance Manager, the Vice President of North American Operations, and the Chief Operating Officer.

Additional Inspectors:

RANDALL COLEMAN, ANIMAL CARE INSPECTOR

MARGARET SHAVER, VETERINARY MEDICAL OFFICER

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**Species Inspected**

Cust No	Cert No	Site	Site Name	Inspection
506554	32-A-0774	005	ENVIGO RMS LLC	25-OCT-2021

Count	Scientific Name	Common Name
003283	<i>Canis lupus familiaris</i>	DOG ADULT
001646	<i>Canis lupus familiaris</i>	DOG PUPPY
004929	Total	



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Envigo RMS LLC
8520 Allison Pointe Blvd., Suite 400
Indianapolis, IN 46250

Customer ID: 506554
Certificate: 32-A-0774
Site: 005
ENVIGO RMS LLC

Type: ROUTINE INSPECTION
Date: 16-NOV-2021

2.40(a)(2) Direct Repeat

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

The facility is not ensuring that the attending veterinarian has appropriate authority over medical care and euthanasia of dogs performed by staff members. Staff members that are trained and authorized to conduct euthanasia are not following approved procedures, resulting in the euthanasia of animals using methods that cause pain and discomfort.

***The facility uses an injectable drug (pentobarbital combination) as the primary method of euthanasia. The facility has a written program of veterinary care (PVC) and an SOP (#6014) "Euthanasia of Colony and Research Animals," both approved by the AV which the AV confirmed that staff performing euthanasia are trained on. These documents state that staff may only use methods deemed acceptable for dogs by the current AVMA Panel on Euthanasia and that all dogs must be unconscious when performing intracardiac euthanasia achieved by using a dissociative medication + sedative as anesthesia and includes instructions for assessing consciousness and providing additional anesthetic medication if needed.

Inspectors reviewed 171 medical records documenting euthanasia of 196 dogs and puppies and found that many young puppies are not receiving anesthesia prior to being euthanized via intracardiac injection as required by the SOP.

***In addition, employees have failed to follow the AV's direction regarding treatment of other animals at the facility.

Veterinarians instructed staff to euthanize two adult dogs in early October. As of the inspection neither dog had been

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euthanized and there is no indication the veterinarian reversed their decision.

Weak or moribund dogs are not necessarily unconscious and can still experience pain and discomfort. Intracardiac injections have been found to be painful, stressful, and uncomfortable. To meet the regulatory requirements of euthanasia, death must be induced without evidence of pain or distress. Failure to provide veterinary care as directed by the attending veterinarian undermines their authority and frequently causes unnecessary pain and distress.

Correct by ensuring that the AV has adequate authority to ensure the provision of veterinary care and to oversee all other aspects of animal care and use.

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

A total of 30 dogs present on inspection had severe dental disease and had not received adequate care to address this issue. Additionally, 12 of these dogs had concurrent issues which similarly had not received adequate veterinary care.

These additional issues included severe medical conditions of the ears, eyes, feet, skin, haircoat, and poor body condition.

***Dental disease: Thirty adult beagles ranging from 2 to 7 years old were found with signs of severe dental disease including: loose teeth which moved with light pressure, exposed roots of teeth, pus along the gumlines, bleeding gums, hair and foreign material embedded in the gumlines, severe recession of the gums, severely reddened and inflamed gums, missing teeth, and significant accumulations of dark colored hard material (calculus) along the teeth. Treatment for these dogs (dental cleanings / extractions) had not been provided despite observation as early as Aug-2021.

***Poor body condition (1 dog): One nursing female dog had extremely prominent bones in the shoulders, ribs, hips, and back and had been underweight since Aug 2021. No treatment was provided for either condition.

***Foot Medical Conditions (7 dogs): The majority of these dogs had masses occurring between their toes that were reddened / inflamed and often oozing discharge consistent with interdigital cysts. One dog had toenails which were

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overgrown to the point that the nails had a severe curve and caused abnormal toe position when the dog was placed on a solid surface.

*** Ear Medical Conditions (2 dogs): . One dog's ear canals and surrounding skin was bright pink and inflamed and had significant accumulations of dark brown waxy material in the ear canals, consistent with an ear infection. The other had wounds on the external ear and significant thickening of the ear pinna.

*** Eye Medical Conditions (1 dog): This dog had a small mass on the lower right eyelid.

*** Skin Medical Conditions (1 dog): This dog had large areas of hair loss along the entire length of its back from neck to hips and across the shoulders and rib cage. Skin is reddened in some areas.

Failure to provide adequate veterinary care to the animals listed above can result in worsening of the conditions and unnecessary discomfort and suffering. Each of the dogs and conditions listed above were identified to the facility while inspectors were on-site (11/16 to 11/19) and provided again during the exit briefing. Correct by assuring all dogs with medical conditions are evaluated by a veterinarian for an accurate diagnosis and to develop an effective treatment plan and then following through with the treatment plan. Each dealer shall use appropriate methods to prevent, treat, diagnose, and control diseases and injuries.

2.40(b)(3) Direct Repeat

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

A total of 34 dogs (in addition to those listed above) had medical conditions that were not identified or treated by the facility prior to the inspection.

***Dental disease (7 dogs): Severe dental disease (similar to those described above).

***Generalized weakness (3 dogs): One adult beagle and two puppies were identified by inspectors with serious medical conditions resulting in weakness. Weakness, lethargy, and the other signs presented by dogs are indicators of serious underlying health conditions.

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***Wounds (8 dogs): Eight dogs and puppies had traumatic wounds that were not identified by the facility prior to inspection. These wounds ranged in severity and included wounds to the legs, chest, abdomen, neck, ears, and tails of these dogs. Many of these wounds had dark brown dried material consistent with blood on the surrounding fur.

***Lameness / Foot Medical Conditions (8 dogs): Injuries included bright, red masses, digits that popped/cracked when manipulated, swollen toes, refusal to bear weight.

***Masses (2 dogs): One puppy had a large soft, fluid filled, swelling on the top of its head. The other, an adult female beagle, had a ½ inch blue colored mass present on her abdomen near her teat.

*** Reproductive Medical Conditions (2 dogs): One dog was present in the kennel with his penis exposed and dry during examination. Another dog was identified in facility records as found dead on 11/1/21. On necropsy she was diagnosed with a ruptured uterus. There was no record of abdominal pain, vaginal discharge, difficulty whelping, or similar sign that preceded the facility finding this dog dead.

*** Eye Medical Conditions (6 dogs): Eye medical conditions observed included cloudy eyes with discharge, pea-sized masses at the corner of the eye, and corneal discoloration with a pigmented mass.

*** Ear Medical Conditions (2 dogs): Two dogs had severe medical conditions of the ears. One had significant redness and inflammation in both ears. The dog was observed shaking its head and scratching its left ear. An additional dog had discharge present at the opening of the ear canal and the skin of the ear canal was reddened with brown debris present and sticking to the skin. A large laceration was also present on this ear.

*** Skin Medical Conditions (3 dogs): Three dogs had significant skin medical conditions characterized by hair loss, peeling skin, crusts, flakes, and dull fur.

Failure to identify animals presenting with abnormal medical conditions can delay necessary veterinary intervention which could prolong any potential suffering and may even result in the animal's death. Daily observations of animals to identify

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medical problems is essential for animal health and welfare. Correct by observing all animals at least daily to identify physical, medical, or behavioral problems. Additionally, ensure that all findings are communicated in a timely manner to the attending veterinarian so that they can examine animals and ensure that appropriate treatment is provided.

2.75(a)(1) Repeat

Records: Dealers and exhibitors.

The facility's acquisition, disposition, and animal on hand records are incomplete and inaccurate for at least 937 dogs and puppies.

- At least 5 dogs (1 adult CFLCTK and 4 puppies) had no acquisition information, no disposition information, and were missing entirely from the record of animals on hand.
- Disposition Information was present, but inaccurate for one adult dog (CLLCUV). This dog was documented as having been sold on 4/7/2021. This animal was present during the inspection and was undergoing medical treatment. Facility representatives confirmed the identification for this dog.
- Records were missing required information (color and gender) for 832 puppies. This includes: 126 puppies which listed sex and description as "unknown" and 706 puppies that have gender recorded but listed color and distinctive markings as "TBD".
- The facility self-identified approximately an additional 99 dogs and puppies with inaccurate disposition records that were recorded as no longer active but had no disposition records. Accurate and complete recordkeeping of all acquisitions and dispositions is important for animal identification, traceability, and investigation of disease outbreaks or animal theft. The facility must ensure that all required acquisition and disposition information is maintained at all times.

2.131(b)(1) Direct Repeat

Handling of animals.

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On 11/16/21, 21 puppies were found to be handled in a manner that they were damp, shivering, and cold in building G3. According to facility records, 25 additional puppies had been found dead with cause of death attributed to cold exposure in building G3 over the last 8 weeks.

***Bldg G3 Room 1 enclosures #54, 55, & 56 housed nursing female beagles and their 4- to 5-week-old puppies. Building G3 Room 2 enclosures #43, 54, & 72 housed 5- to 7-week-old puppies without dams. The enclosures had all recently been cleaned with cold water and kennels were not dried prior to replacing puppies. These enclosures were on the side of the room opposite the radiant heater. None of these enclosures had any solid resting surface or bedding. No heat lamps were present in room 1. Enclosures in room 2 had heat lamps which were present, but not plugged in at the time of inspection. On 11/19/21 Bldg G3, Room 1 was re-checked and there were still no heat lamps installed. Again, several puppies were observed shivering.

All handling of animals, including cleaning activities and housing, must be done as carefully and expeditiously as possible and in a manner that does not cause excessive cooling. Allowing puppies to become wet and chilled during / following cleaning or not providing sufficient heating/bedding causes discomfort and may result in illness or death. Correct by ensuring that all animals are handled as carefully and expeditiously as possible and in a manner that does not cause trauma, overheating, excessive cooling, behavioral stress, physical harm, or unnecessary discomfort.

3.1(a) Direct

Housing facilities, general.

Numerous construction and maintenance issues were identified during the inspection.

***Flooring Gaps: Approximately 75% of enclosures have flooring which is not cut to the same size and shape as the enclosure walls resulting in large gaps between the floor and the fencing. Gaps measured up to 2 inches wide and inspectors saw dogs fall or step into the gaps alongside the flooring. Facility medical records document at least 10 additional dogs and puppies that were significantly injured by improperly constructed and maintained enclosures during

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the period from 9/2/21 to 11/2/21.

***Chain-link Fencing Gaps: Gaps were present in fencing where chain link had become detached from the fence frame. Gaps range from only a few inches wide to the entire section of chain link forming the barrier between enclosures no longer being attached to the metal frame. Housing facilities that have not been kept in good repair with numerous areas of unsecured fencing, may injure dogs by entrapping limbs or may fail to adequately contain the dogs.

***Access Doors: Approximately 30% of the enclosures have access doors with structural damage to the metal frames and swinging mechanisms (such as broken hinges, doors that won't stay shut, doors where the plastic flap is stuck and can't move, and damaged door frames which bend outward and leave up to 6-inch gap between the frame and the wall). Inspectors observed dogs attempting to squeeze through the gap with the guillotine doors locked while others attempted to squeeze through space between the metal flashing of the door frame and wall.

***Sharp Points: Approximately 50% of enclosures have sharp points and edges. There are multiple areas with sharp points from broken chain link sticking directly into the enclosure where the dogs would walk, drink water, and jump up around the feeders.

***Enclosure Walls: Approximately 20% of the enclosures in G1 and G2 do not have enclosure side panels properly secured to the back wall or to adjacent fencing. Inspectors observed the unsecured panels rock back and forth as the dogs jumped up and put their forelegs on them.

***Broken Waterers and Self-Feeders: Numerous automatic waterers are leaking water onto the flooring of the cement walkway and beneath the enclosures. The leaking water is pooling beneath the metal self-feeders where it is mixing with spilled food creating a wet, moldy environment that is a breeding ground for insects. There are several broken metal self-feeders that are spilling food onto the cement floor.

***Unsecured Flooring: Several enclosures have flooring that is not secured to the framework beneath it or lacks support

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from underneath. In these enclosures, the floors bounce up and down, shift, tilt, or sink under the weight of the dogs as they move about the enclosure. Flooring that is not properly secured to the framework can cause injury to the dogs and should unsupported flooring collapse, the animal could be seriously injured or escape the enclosure.

Housing facilities for dogs must be constructed and designed so they are structurally sound, kept in good repair and protect the animals from injury. Correct by repairing or replacing damaged or broken facilities and ensure that all aspects of the enclosures are maintained in good repair and are safe for the dogs at all times. To be corrected by: 11 Feb 2022.

3.1(c)(1) Repeat

Housing facilities, general.

The facility continues to have widespread lack of maintenance of the primary enclosures, dog toys, and surfaces in contact with dogs. These issues include chewed plastic dog door flaps, chewed guillotine-style doors, lixit lines chewed to the point the outer pipe is completely missing, chewed plastic boards used to fill gaps along the flooring, excessive rust, and areas of flaking paint and chipped, broken, pitted, unsealed, cracked, and crumbling concrete. Severely rusted metal or damaged concrete can comprise the structural integrity of the object, leading to increased risk of injury in the dogs.

Excessive chew damage and issues with concrete can prevent proper cleaning and sanitization. The surfaces of housing facilities and objects within the facility must be constructed in a manner and made of materials that allows them to be readily cleaned and sanitized or removed and replaced when worn or soiled. The dealer must repair or replace damaged surfaces so that they are free from excessive rust and sharp points and able to be cleaned and sanitized effectively.

3.1(c)(3) Repeat

Housing facilities, general.

The facility continues to have surfaces in contact with dogs that are not being cleaned adequately enough to prevent the build-up of dirt and grime. Numerous enclosures have an excessive accumulation of organic material covering on multiple surfaces.

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According to the facility the enclosures receive a “rough hosing” once per day with either a pressure washer or a standard hose. The amount of organic material accumulated on enclosure surfaces indicates the current cleaning frequencies and methods are not adequate. Buildups of organic material increase the risk of disease towards the dogs. Correct by ensuring that all hard surfaces which dogs come in contact with are adequately cleaned in a manner which prevents the accumulation of excreta and reduces disease hazards.

3.1(e)

Housing facilities, general.

Food and bedding supplies are not being stored properly to protect them from spoilage, contamination and vermin infestation. In 96 room 6 there is an open bag of shavings sitting on the floor and 97 room 8 there is an open bag of shavings stored in a trash can with no lid.

Open bags of shavings and food can become contaminated by pests such as insects and rodents which could have a negative impact on the health and well-being of the dogs. All open supplies of food and bedding must be kept in leakproof containers with tightly fitted lids. The licensee must move the open bags of food and shavings into leakproof containers with tightly fitted lids. The licensee must ensure that all food and bedding is properly stored at all times. To be corrected by: 11 Feb 2022.

3.2(d)

Indoor housing facilities.

The indoor housing areas which house whelping dogs are not completely impervious to moisture. In building G3 rooms 1 and 2 the concrete walls and center aisleway are not sealed or painted, and the kennel had been recently washed when the inspection was started. The back wall of the enclosures and center aisleways appeared wet in patches indicating that any prior sealing of the concrete has likely worn and the concrete is no longer impervious to moisture. Some walls have large cracks running down the length of them for several feet which create another avenue for moisture to penetrate the

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concrete.

Surfaces that are not impervious to moisture cannot be properly cleaned and sanitized which could increase the risk of disease hazards towards the dogs. Absorption of water could also undermine a surface's structural integrity causing it to fail and potentially injure an animal. Surfaces of indoor housing facilities, including floors and walls, must be impervious to moisture. The licensee must ensure that the affected surfaces are sealed or painted in a manner that makes them impervious to moisture and that they are maintained appropriately to support the health and well-being of the animals. To be corrected by: 1 April 2022.

3.3(d)

Sheltered housing facilities.

Multiple dogs do not have adequate protection from the elements within their shelter due to missing access door flaps. Enclosure in G1 & G2 are constructed with openings in the back wall to allow the dogs to move between the indoor and outdoor portions of the enclosure. Several enclosures are missing the flap which covers this egress opening. This allows extreme weather, such as frigid temperatures, to enter the sheltered portion. While a guillotine type door is present, this door is only closed during cleaning and is left open overnight and most of the day providing no break from wind. Numerous other enclosures have flaps severely damaged by chewing; in those enclosures, 50-75% of the flap is missing leaving it similarly ineffective at providing shelter. During the week of the inspection, overnight temperatures fell to the low 20s and 30s Fahrenheit. Enclosures with missing flaps housed at least 9 dogs while those with severely damaged flaps housed many more. Dogs in adjacent enclosures were likely exposed to drafts as well. Failure to fully protect the sheltered portion of the enclosure may not allow the dogs to completely escape extreme weather conditions which can result in discomfort or illness. The licensee must repair or replace these flaps in order to provide adequate shelter from the elements including protection from freezing temperatures. To be corrected by: 11 Feb 2022.

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3.6(a)(2)(ii) Direct Repeat

Primary enclosures.

The enclosures at this facility continue to fail to protect the dogs from injury. There are numerous examples of body parts being pulled into adjacent enclosures by neighboring dogs causing injuries to the dogs involved. On 11/19/21, APHIS inspectors observed a neighboring dog from an adjacent enclosure reach through the dividing bars and grab the right ear of dog ???-CCE. Dog ???-CCE vocalized loudly indicating pain while the other dog continuously pulled his ear. Two additional dogs (CLDCXC and CLCCMT) were identified in facility mortality logs from Nov-2021 with similar severe ear injuries described as "severe damage to R ear" and "missing part of R & L ears." The openings in the dividers between enclosures are large enough that feet, tails, and ears of dogs can be pulled through to an adjacent enclosure. While this type of enclosure would often be suitable for group-housed dogs, the widespread compatibility problems also identified at this facility make this enclosure style inadequate to protect dogs from injury by those in adjacent enclosures.

Enclosures which are constructed in a manner that do not protect animals can lead to injuries caused either by the enclosure itself or animals in adjacent enclosure. This leads to unnecessary pain, suffering, and even death for animals that are injured. Correct by ensuring that all enclosures are constructed and maintained in a manner that prevents injury.

3.6(a)(2)(x) Direct Repeat

Primary enclosures.

The facility continues to house nearly all the dogs on raised slatted floor identified on previous inspections as especially dangerous to the dogs. On this inspection, 6 dogs were found actively stuck in the flooring, requiring facility representatives to manually remove them. Based on records, at least nine other dogs were entrapped in the floor between 8/1/21 and 11/3/21. Several of these dogs were injured and required treatment for lameness and wounds. The 6 dogs found with feet/toes trapped between slats of the flooring were present in both buildings G1 and G2.

-Weaned puppies as young as 6-7 weeks of age also continue to be housed on the same slatted flooring. Inspectors

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witnessed the toes and feet of several puppies pass through the openings of the floor. Butcher paper laid over the existing flooring is not a sufficient correction. Puppies were observed urinating on and playing with the paper by tearing it, resulting in exposure of the dangerous flooring within minutes of paper being put into the enclosure.

The facility has not implemented any effective corrections to eliminate the risk of entrapment to older dogs or to stop the ability of a puppy's feet and legs to pass through the floor openings. After each of the dogs found stuck was released from the floor, the animal was returned to an enclosure with the same flooring.

The risk of serious injury is particularly elevated if dogs are entrapped while no staff is present to help release them from the floor. Openings in the floor that are large enough to allow the feet and legs to pass through can lead to entrapment of a dog which can be painful, distressful, and may result in serious injury to the animal. The licensee must ensure that all floors are constructed in a manner that protects the dogs' feet and legs from injury and that slatted floors do not allow feet and legs to pass through any openings.

3.6(c)(1)(i) Direct

Primary enclosures.

A total of 742 young dogs and weaned puppies were not provided with the minimum space required by the Animal Welfare Act. Representative animals and enclosures were measured in several rooms in buildings G2 and G3. In each case, the Manager of Operations and/or Director of Operations confirmed that the enclosures and animals measured were consistently sized and representative of the those in the room.

- Building G3 Room 2 contained 7 enclosures housing a total of 53 recently weaned puppies. Enclosures measured 47 inches x 49 inches (16 square feet) and average-sized co-housed puppies required 2.4 sq ft each. Enclosures housed as many as 9 puppies (requiring 21.8 sq. feet).

- Building G2 Room 1 contained 4 enclosures with 6 six-month-old beagles each (24 dogs total). Enclosures in this room measured a total of 38.9 sq. feet per enclosure (including both the indoor and outdoor portions). Six average-sized co-

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housed dogs collectively required 39.8 sq feet per enclosure.

- Building G2 Room 6 contained fifteen enclosures (housing a total of 126 four- to five-month-old dogs). Enclosures in this room measured a total 39.7 sq. feet and co-housed dogs required a minimum of 6 sq. feet each. Enclosures housed as many as 10 dogs each (requiring 60.4 sq. feet per enclosure).

- Building G2 Room 7 contained 60 enclosures (housing a total of 539 young dogs). Enclosures measured a total of 39.5 to 39.7 sq. feet and average-sized co-housed dogs required a minimum of 5.35 sq. feet each. Enclosures housed 11 dogs each (requiring 58.9 sq. feet per enclosure).

Failing to provide adequate space can cause discomfort, crowding, distress, poor sanitation, increased incidence of illness, and aggression. Prolonged overcrowding can also lead to engrained and long-lasting negative behaviors (such as increased aggression and future incompatibility, as is seen at this facility) as dogs age. Correct by ensuring that all animals at this facility are provided with at least the minimum space required by the Animal Welfare Act. This issue was identified to facility representatives each day as the rooms were inspected (16, 18, and 19 of November). To be corrected by: 11 Feb 2022.

3.7 **Direct** **Repeat**

Compatible grouping.

The facility continues to have severe compatibility problems amongst the adult dogs and puppies. Inspectors witnessed numerous serious dog fights during the inspection, found dogs with injuries from recent fights, and observed dogs aggressively guarding food from cage mates. On multiple occasions the inspection had to be temporarily stopped in order to remove incompatible dogs. Facility records documented dogs that have been injured due to fighting outside of the inspection process..

Housing incompatible dogs together or allowing incompatible dogs to have access to each other can result in serious injury or even the death of an animal. Even though this facility continues to have compatibility problems in their group

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housed animals, there has been no action taken by the facility to proactively identify and separate dogs that are incompatible. Currently the facility only responds after a fight occurs and then only by moving one of the dogs if the fight was deemed severe enough to warrant moving the animal. Correct by ensuring that all animals housed together are compatible.

3.9(a) Direct Repeat

Feeding

Food being fed to nursing female dogs and their puppies was not wholesome or palatable. On 11/16/21 inspectors checked a random sample of food receptacles in two rooms housing a total of 85 adult dogs and 488 puppies. Every feeder checked contained food that was wet, caked, and/or moldy. The food in two feeders was also contaminated with large numbers of live maggots. Inspectors requested the feeders be cleaned and food be replaced as soon as possible and representatives stated that they would. On 11/19/21, the inspectors returned to this area and conducted another sampling of food receptacles for nursing dogs and puppies. The feeders checked still had either moldy and/or caked feed inside them.

Food that is caked, moldy, and/or infested with insects is not considered wholesome and palatable and may lead to reduced feed consumption, poor nutrition and body condition. Food must be uncontaminated, wholesome, palatable, and of sufficient quantity and nutritive value. The licensee must remove any contaminated or caked food from the feeders and ensure that all food items remain uncontaminated and wholesome at all times.

3.9(b) Direct

Feeding

The self-feeders at this facility are not accessible to all animals, are located in a manner that fails to minimize contamination and they are not being cleaned and sanitized adequately.

In most feeders the opening is circular and accommodates only one adult dog's head at a time. Some enclosures have a

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wider rectangular opening that usually still accommodates only one dog to access feed at a time. The following concerns were noted by inspectors:

- The facility's self-feeders are not accessible to all adults and puppies at the facility due to an inadequate number of feeders and food guarding behaviors which were exhibited by many animals. There is one feeder available for each enclosure of dogs (often 4-11 animals). In building G3 (housing nursing female dogs), access to the food for nursing mother dogs was frequently blocked by 1 or more young puppies sleeping inside this feeder.
- The facility's self-feeders are located in a manner that fails to minimize contamination and grossly contaminated feed was observed in all feeders that were checked in building G3. The feeders in all buildings are mounted with the opening dogs use to access food only 1-2 inches from the floor of the enclosure. This placement allows back splashed water mixed with feces to be sprayed into the feeder during pressure washing of the enclosure. Additionally, the feeders are so low that young puppies are able to fully crawl inside the feeder openings and were frequently found sleeping directly on the food.
- The facility's self-feeders are not currently being cleaned frequently enough. Numerous feeders throughout the facility had an excessive layer of grime covering the interior metal walls

Correct by ensuring food receptacles are readily accessible to all dogs, are located so as to minimize contamination by excreta and pests and are kept clean and sanitized in accordance with 3.11(b). To be corrected by: 11 Feb 2022.

3.11(a)

Repeat

Cleaning, sanitization, housekeeping, and pest control.

The facility continues to have a general sanitation problem with cleaning waste from under primary enclosures as often as necessary to prevent the accumulation of feces and food waste to reduce disease hazards, odors, and insect pests. Many rooms had white, moldy accumulations of spilled feed and excreta in the pits that were several inches high and created areas of standing liquid. The majority of rooms in buildings G1 & G2 have significant accumulations of dropped

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feed and excreta on the ledges just underneath the suspended flooring. The food waste and organic material build-up has been present long enough that in many rooms it is either white, brown, or black with mold and numerous small pit/sewer flies were observed congregating on the wastes. In several rooms, standing water in the aisleway was cloudy and mixed with large amounts of food debris and contained numerous white thread-like 'worms'.

Buildup of feces, urine, food waste, and wastewater provide breeding grounds for pests and insects. Additionally, they expose dogs to unnecessary disease hazards and noxious odors. Correct by ensuring that excreta and food waste is removed from under primary enclosures and feeders as often as necessary to prevent accumulation and reduce pests and odors.

3.11(b)(2) Repeat

Cleaning, sanitization, housekeeping, and pest control.

The facility is not sanitizing the enclosures or water receptacles at the minimum frequency of every 2 weeks and frequently enough to prevent the accumulation of dirt, debris and other disease hazards.

- Facility records from October and November showed many rooms are sanitized as infrequently as every 3-4 weeks while some have no documentation of being sanitized at all during October and November.
- Many of the automatic waterers (lixit pipes) and metal nipples are covered in an orange-colored film and there is rust-colored debris stuck on the inside surfaces of the metal nipple. Many also have a black mold-like substance forming on top of the spout. The portions of the metal enclosure directly adjacent to the nipple are frequently covered with rust and/or flaking white particles, hair, dirt and other grime.

Routine sanitization of enclosures and water receptacles for dogs is important to prevent the accumulation of disease hazards towards dogs. Correct by sanitizing primary enclosures and water receptacles for dogs at least once every 2 weeks or as often as necessary to prevent the accumulation of dirt, debris, food waste, excreta, and other disease hazards.

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3.11(c)

Cleaning, sanitization, housekeeping, and pest control.

Buildings on the facility's property are not being kept clean and free of accumulations of trash, junk, waste products, and discarded matter.

-- Ventilation fans in buildings G1 and G2 are covered in a thick layer of dust, grime and debris with numerous dead bugs and spider webs forming inside the fan housings.

-The drainage pit covers (which are outside of any primary enclosure) in buildings G1, G2, and G3 are covered with an excessive layer of accumulated hair, dirt, debris, and other waste products.

-- The facility has a separate building used for storage of feed, supplies, and equipment and cleaning of shipping crates.

This building is excessively cluttered and contains excessive trash, junk, dusty unused caging material and equipment.

There is also a large store of rusty metal feeders that the facility representative stated they weren't sure which were broken versus which were able to be used. Excessive accumulations of waste such as hair, dirt, and other debris can provide breeding grounds for pests and contribute to odors. Large amounts of clutter provide breeding areas for rodents and other pests. Additionally, the amount of disorganized broken equipment makes it difficult to locate functional equipment when needed.

Correct by ensuring premises, including buildings and surrounding grounds, are kept clean and in good repair and reduce or eliminate breeding and living areas for rodents and other pests and vermin. Also ensure that premises are kept free of accumulations of trash, junk, waste products, and discarded matter. To be corrected by: 1 April 2022.

3.11(d) Direct Repeat

Cleaning, sanitization, housekeeping, and pest control.

The facility's plan to control pests is not effective and insect infestations were found in multiple buildings.

Large numbers of small gnat-sized black flies were seen throughout the facility on the wall dividers, feeders, and on

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organic material in the pits beneath the enclosures. Larger flies (house-fly type) were seen throughout the facility in several rooms on walls, feeders, aisleways, and in enclosures of the animals. Large numbers of small white fly larvae or maggots are present in spilled feed under enclosures and many areas of wet flooring appear to be almost completely covered in maggots. Large numbers of small, white, thread-like "worms" were seen in several rooms throughout the facility where there is pooled water.

Failure to control insects may result in discomfort to the dogs as well as cause contamination of the food and environment which could have a negative impact on the dogs' health and well-being. The licensee must establish an effective plan to control the many species of insects infesting the buildings. Additionally, ensure that the plan remains effective at controlling insect, avian, and mammalian pests all times in order to ensure the health and well-being of the dogs.

3.12 **Direct** **Repeat**

Employees

The facility continues to have an insufficient number of employees to provide care and husbandry practices required by the Animal Welfare Act. The facility currently employs only 21 full-time and 3 part-time employees who are responsible for all husbandry and daily observations for 4,652 dogs and puppies. The current staff level is not adequate to perform the tasks required such as daily observations, medical treatments, cleaning and sanitization, and facility maintenance as documented on this and previous reports.

The continued lack of an adequate number of employees needed to carryout basic husbandry practices and care for the animals is having a severe adverse impact to the well-being of these animals by delaying necessary medical treatments and basic husbandry. Correct by ensuring that the dealer employs an adequate number of appropriately trained and supervised employees as needed to carry out the required provisions of the Animal Welfare Act.

3.13(a)

Veterinary care for dogs.

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The facility's written Program of Veterinary Care (PVC) for dogs is missing required elements. The PVC does not specify the frequency of regularly scheduled visits and is not signed as required by 3.13(a)(1).

A written PVC is important to ensure clear communication of expectations. The written PVC must address the frequency with which the AV will conduct regularly scheduled visits to all premises in order to assess the animals and other aspects of veterinary care, even when the AV is full time. In addition, the PVC allows the full time AV to specify how long they may be away from a facility without needing routine coverage from a relief veterinarian. Failing to address the frequency and/or timing of regularly scheduled visits may lead to excessive intervals between visits or gaps in the assessment of care being provided to animals. In addition, a signature is required on the PVC to document the involvement of the AV in the development of the written plan. Correct by ensuring that a frequency of visits to the areas where animals are housed (in order to assess the adequacy of animal care and use) is specified and further by ensuring that the written PVC is signed by the attending veterinarian. To be corrected by: 10 Feb 2022.

3.13(a)(2) Direct

Veterinary care for dogs.

A complete hands-on physical examination has not been completed within the last 12 months for approximately 10% of the dogs over a year old for which records were evaluated. This dealer only acquires dogs through on-site breeding, so all dogs have been on-site since birth.

. Failure to have dogs examined by a veterinarian at least annually can result in delays in the proper diagnosis and treatment of underlying medical conditions. Correct by ensuring that a complete physical examination from head to tail of each dog is completed by the attending veterinarian not less than once every 12 months. To be corrected by: 11 Feb 2022.

3.13(b)(1)

Veterinary care for dogs.

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The facility does not have all the required components of the identity of each animal on their different medical record documents. The facility currently maintains medical records filed by the type of record and date of procedure rather than by individual animal. Specific types of medical records are missing required information such as breed, age, sex and individual identification on some or all of the medical records. Affected forms include clinical treatment forms, inventory change notices, mortality records, post wean mastitis treatment forms, annual USDA beagle treatment and physical exam forms, and controlled substance administration records.

According to the Manager of Operations, the facility did not realize that each of these documents constitutes a medical record for the dog listed and therefore are subject to 3.13(b)(1). Without these required components, a specific medical record cannot be consistently and accurately linked to an individual animal. Additionally, information such as age, breed, and gender can play a significant role in the proper diagnosis and treatment of medical conditions.

Accurate medical records are crucial for ensuring appropriate veterinary care is being provided to every animal. Correct by ensuring every medical record for dog's includes the identity of the animal, including identifying marks, tattoos, or tags on the animal and the animal's breed, sex, and age. To be corrected by: 11 Feb 2022.

3.13(b)(2) Repeat

Veterinary care for dogs.

The facility does not have complete or accurate medical records for their dogs. The medical records created when problems have been identified (such as disease, injury, or illness) are missing critical components such as complete descriptions of the problem, treatments administered, and procedures performed in order to provide care or diagnose the condition. Additionally, the medical records for several animals contain gross inaccuracies such as one dog (CFLCTK) which stated that it had been euthanized when it had not been.

Approximately 59% of all euthanasia records evaluated (Aug-Nov 2021) were missing the route of administration for euthanasia drugs.

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Incomplete or inaccurate medical records do not allow the attending veterinarian to adequately assess the adherence of employees to specific protocols, ensure humane handling, or assess the needs of individual animals or the colony as a whole. Correct by ensuring that when a problem is identified in a dog (such as disease, injury, or illness), the date and description of the problem, examination findings, test results, plan for treatment and care, and treatment procedures performed are recorded in the medical records.

This inspection was conducted on site November 16-19 with the Manager of Operations, Director of Operations, Attending Veterinarian, and numerous other employees. Records and paperwork were examined remotely for the remainder of the inspection.

The exit briefing was conducted on 12/17/21 with the Manager of Operations, Attending Veterinarian, Direct of Operations, Senior Vice President for Veterinary Services, and the Vice President for North American Operations.

Additional Inspectors:

KELLY MAXWELL, ANIMAL CARE INSPECTOR

Rachel Perez-Baum, Veterinary Medical Officer

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Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
506554	32-A-0774	005	ENVIGO RMS LLC	16-NOV-2021

Count	Scientific Name	Common Name
002719	<i>Canis lupus familiaris</i>	DOG ADULT
001933	<i>Canis lupus familiaris</i>	DOG PUPPY
004652	Total	



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Envigo RMS LLC
8520 Allison Pointe Blvd., Suite 400
Indianapolis, IN 46250

Customer ID: 506554
Certificate: 32-A-0774
Site: 005
ENVIGO RMS LLC

Type: FOCUSED INSPECTION
Date: 08-MAR-2022

2.40(b)(3) Repeat

Attending veterinarian and adequate veterinary care (dealers and exhibitors).

A 7-month old male beagle has wounds to the right ear that were not identified or treated by the facility. CMHCFF, a young male beagle, has several scabbed wounds with yellow discharge on the underside of the right ear extending from the base of the ear.

Failure to identify animals presenting with abnormal medical conditions can delay necessary veterinary intervention which could prolong any potential suffering.

Correct by observing all animals at least daily to identify physical, medical, or behavioral problems. Additionally, ensure that all findings are communicated in a timely manner to the attending veterinarian so that they can examine animals and ensure that appropriate treatment is provided.

3.1(a) Repeat

Housing facilities, general.

The facility continues to have construction and maintenance issues regarding enclosure design, stability and protecting the animals from injury.

*** The enclosures are comprised of stainless steel or chain-link walls with a "tender-foot"-like flooring that is suspended above a waste gutter using long metal rods to provide support. Due to construction variability, the flooring frequently

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leaves gaps up to two inches along the front and/or sides of the enclosure. These gaps are large enough for a foot or leg to pass through the openings. Throughout the inspection, at least 130 enclosures had these gaps present and dogs were seen with toes in the gaps.

*** Several enclosures in Buildings G1 and G2 also have flooring that is not properly supported from underneath. These floors consistently bounce, vibrate, or tilt as the dogs move across the floors.

*** Gaps were also noticed in the fencing where the chain link had become detached from the frame in Building G1 Room 4. One gap in the fencing was only a few inches (enough to trap a foot or leg) and located in the corner by the waterer. Another gap was the length of the enclosure sidewall. Two adjacent pens share a common chain-link side wall that is unattached at the base of the enclosure. The metal at the bottom of the wall had rusted to the point of breaking off, leaving a sharp point at floor level. The entire section of chain link forming the barrier between enclosures is no longer attached to the metal frame. This allowed the chain-link to swing easily when dogs were jumping on or pushing against the chain-link. The fencing was so loose that a dog would be able to simply push their way under it to enter the adjacent enclosure.

*** Multiple enclosures in Buildings G1 and G2 have sharp points at the levels of the dogs. These sharp points are primarily caused by metal that has rusted to the point of disintegration and left behind sharp edges.

*** A review of medical records for dogs treated for injuries between 11/18/21 and 3/8/22 revealed one dog injured by the enclosure. A female beagle, CMJCIN, was found on 1/11/22 with her left rear leg caught in the door. There was minor swelling associated with the injury and she was treated by the facility and recovered uneventfully. Additionally, another 8 dogs were treated for tail injuries which varied from minor wounds to tail fractures and bone exposure. (CMECVW, CMDCGP, CLHCEW, CMHCAZ, CMHCDK, CMHCJB, CMECTW). The facility stated they are still reviewing these cases for an underlying cause but are looking into possible injury by the new egress doors.

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Housing facilities that have not been kept in good repair, such as unsecured fencing or flooring, gaps around the floor, or sharp points may injure dogs by entrapping limbs or may fail to adequately contain the dogs.

Housing facilities for dogs must be constructed and designed so they are structurally sound, kept in good repair and protect the animals from injury. Correct by repairing or replacing damaged or broken facilities and ensure that all aspects of the enclosures are maintained in good repair and are safe for the dogs at all times.

3.6(a)(2)(x) **Direct** **Repeat**

Primary enclosures.

The facility houses nearly all dogs over 12 weeks of age on a slatted floor. This flooring is a heavy gauge rubber or plastic-coated metal flooring with rectangular openings that are approximately $\frac{1}{2}$ inch by 2.5 inches. This flooring has been identified on previous inspections to be dangerous because dogs have been found by inspectors with feet / toes stuck in the flooring. Additional instances were identified by the facility that occurred prior to inspection.

*** On this inspection a total of 2 dogs were found actively stuck in the flooring to the point that the facility representatives had to remove one of them from the flooring.

- In Building G2, Room 8, after a skirmish broke out in an enclosure housing four male beagles, one of the beagles got his back left foot trapped in the flooring for approximately 11 seconds before he was able to pull free.

- In Building G2, Room 5, a male beagle, CMDCCF was found by inspectors with both rear feet trapped in the flooring.

The dog was unable to extract itself and required assistance from the facility representative to free the foot from the floor.

*** A review of the medical records indicates that at least 12 additional dogs have been entrapped in the floor during the period of 11/18/21 to 3/8/22. Their injuries ranged from mild soreness to pressure wounds that required treatment for over two weeks.

Openings in the floor that are large enough to allow the feet and legs to pass through can lead to entrapment of a dog which can be painful, distressful, and may result in serious injury to the animal.

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Primary enclosures for dogs must have floors that are constructed in a manner that protects the dogs' feet and legs from injury. When floors are of mesh or slatted construction, they must not allow the dogs' feet to pass through any openings in the floor. The licensee must alter the flooring in a manner that eliminates the risk of entrapment and injury and ensures no feet or legs can pass through the floor openings. The licensee must ensure that all flooring is safe for the dogs at all times in order to support their health and well-being.

3.7 Direct Repeat

Compatible grouping.

The facility continues to have compatibility problems amongst the adult dogs leading to 97 dogs receiving body and/or extremity injuries, some severe. During inspection by APHIS officials, an animal caretaker in Building G2 entered the treatment room with a beagle with a severe ear wound. The left ear was covered with fresh blood and had multiple skin tears requiring skin staples for repair.

Medical records for dogs injured between 11/18/21 and 3/8/22 identified 59 dogs with injuries attributed to a fight.

Documented injuries include lacerations, bite wounds, bruised and damaged extremities, ear damage, and tail damage. Eight dogs were euthanized as a result. In addition to the 59 dogs, another 38 dogs were treated for wounds of an unknown cause. These wounds primarily comprised of tail injuries and lacerations to ears.

Housing incompatible dogs together or allowing incompatible dogs to have access to each other can result in serious injuries, impacting the welfare of the animals.

The facility must ensure that all animals are always housed in compatible conditions in order to ensure their safety and well-being.

3.9(b) Repeat

Feeding

Prepared By: RACHEL PEREZ-BAUM

USDA, APHIS, Animal Care

Date:
18-MAR-2022

Title: VETERINARY MEDICAL
OFFICER

Received by Title: Facility Representative

Date:
18-MAR-2022



Inspection Report

The self-feeders at the facility are not being cleaned adequately and do not prevent molding, deterioration, and caking of feed.

*** Wet food with varying amounts of mold continues to be a problem in Building G3.

- In Building G3 Room 2, which houses nursing female dogs, 6 out of 7 feeders checked had some moldy food located at the bottom front joint of the feeder tray. Two enclosures had moldy kibble while others had small amounts mixed with some wet, caked feed.

- In Building G3 Room 1, which houses nursing female dogs, 2 out of 10 feeders checked had some damp food but no mold present.

*** The facility's self-feeders are not currently being cleaned frequently or adequately enough to prevent an accumulation of dirt and debris. Several feeders throughout the facility and all buildings had excessive grime covering the interior metal walls. This grime appeared to be a combination of hair, saliva, food particles, and skin oils. Some of the grime is so thick inspectors had difficulty being able to scrape it off with their fingers. This excessive grime was particularly worse in Building G1, Room 1.

Dirty food receptacles and molding or caking of feed can cause decreased food consumption among animals and put them at unnecessary risk of potential diseases.

Correct by ensuring food receptacles are kept clean and sanitized in accordance with 3.11(b) and measures are taken to ensure there is no molding, deterioration, and caking of feed.

This inspection was conducted with the Manager of Operations, the Attending Veterinarian, the North America Operations Vice President, and the Regional Quality Manager. The exit interview was conducted with the Site Director, Manager of Operations, Attending Veterinarian, North America Operations Vice President, Regional Quality Manager, Senior Vice

Prepared By: RACHEL PEREZ-BAUM **Date:** 18-MAR-2022
USDA, APHIS, Animal Care
Title: VETERINARY MEDICAL
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Received by Title: Facility Representative **Date:** 18-MAR-2022



Inspection Report

President of Veterinary Services, Chief Operating Officer, Global Director of Quality Assurance, and the Chief Executive Officer.

Additional Inspectors:

MARGARET SHAVER, VETERINARY MEDICAL OFFICER

CARLA THOMAS, VETERINARY MEDICAL OFFICER

LORI LINN, ANIMAL CARE INSPECTOR

Prepared By: RACHEL PEREZ-BAUM **Date:**
18-MAR-2022
Title: VETERINARY MEDICAL
OFFICER

Received by Title: Facility Representative

Date:
18-MAR-2022

**Species Inspected**

Cust No	Cert No	Site	Site Name	Inspection
506554	32-A-0774	005	ENVIGO RMS LLC	08-MAR-2022

Count	Scientific Name	Common Name
000079	<i>Canis lupus familiaris</i>	DOG ADULT

000079	Total
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Inspection Report

Envigo RMS LLC
8520 Allison Pointe Blvd., Suite 400
Indianapolis, IN 46250

Customer ID: 506554
Certificate: 32-A-0774
Site: 005
ENVIGO RMS LLC

Type: FOCUSED INSPECTION
Date: 03-MAY-2022

3.6(a)(2)(x) Repeat

Primary enclosures.

The facility houses nearly all dogs over 12 weeks of age on a slatted floor. This flooring is a heavy gauge rubber or plastic-coated metal flooring with rectangular openings that are approximately ½ inch by 2.5 inches. This flooring has been identified on previous inspections to be dangerous because dogs have been found by inspectors with feet / toes stuck in the flooring.

*** On this inspection a total of 2 dogs were found actively stuck in the flooring to the point that the facility representatives had to remove one of them from the flooring.

- In Building G1, Room 6, an adult beagle, CHLCSB, was found with his right rear foot trapped in an opening in the slatted floor. He was quickly and easily removed by staff after being found.

- In Building G1, Room 10, an adult beagle, CHICDM, was found with her right rear foot trapped in an opening in the slatted floor. She required a couple minutes of manipulation before her foot was freed by facility representatives. The dog remained calm during manipulation to free the foot. After being freed from the floor and relocated to different flooring, she was observed and displayed no signs of lameness or pain.

Openings in the floor that are large enough to allow the feet and legs to pass through can lead to entrapment of a dog which can be painful, distressful, and may result in serious injury to the animal.

Prepared By: RACHEL PEREZ-BAUM

USDA, APHIS, Animal Care

Date:
06-MAY-2022

Title: VETERINARY MEDICAL
OFFICER

Received by Title: Facility Representative

Date:
06-MAY-2022



Inspection Report

Primary enclosures for dogs must have floors that are constructed in a manner that protects the dogs' feet and legs from injury. When floors are of mesh or slatted construction, they must not allow the dogs' feet to pass through any openings in the floor. The licensee must alter the flooring in a manner that eliminates the risk of entrapment and injury and ensures no feet or legs can pass through the floor openings. The licensee must ensure that all flooring is safe for the dogs at all times in order to support their health and well-being.

This inspection was conducted with the Manager of Operations and the Vice President of North American Operations.

The exit interview was conducted with the Manager of Operations, Attending Veterinarian, Vice President of North American Operation, Regional Quality Manager, Institutional Official/Chief Operating Officer, Global Director of Quality Assurance.

Additional Inspectors:

Jeffrey Shepherd, SUPERVISORY ANIMAL CARE SPECIALIST

Prepared By: RACHEL PEREZ-BAUM **Date:**
USDA, APHIS, Animal Care
Title: VETERINARY MEDICAL
OFFICER

Received by Title: Facility Representative

Date:
06-MAY-2022

Date:
06-MAY-2022



Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
506554	32-A-0774	005	ENVIGO RMS LLC	03-MAY-2022

Count	Scientific Name	Common Name
002891	<i>Canis lupus familiaris</i>	DOG ADULT
000222	<i>Canis lupus familiaris</i>	DOG PUPPY
003113	Total	